



#653
May 11, 2021

Report to the Mississippi Legislature

A Review of the Mississippi State Park System

PEER: The Mississippi Legislature's Oversight Agency

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May 11, 2021

Honorable Tate Reeves, Governor
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On May 11, 2021, the PEER Committee authorized release of the report titled *A Review of the Mississippi State Park System*.

A handwritten signature in black ink, appearing to read "Timmy Ladner".

Representative Timmy Ladner, Chair

This report does not recommend increased funding or additional staff.

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A Review of the Mississippi State Park System

CONCLUSIONS: Without an annual general fund appropriation, state park operations are not self-sustaining. The state park system relies on contract workers for 39% of the state park workforce, which creates a revolving door of staff within the state park system. Internal challenges facing the state park system include a lack of prioritization in maintenance planning, a lack of strategic marketing, and a lack of accountability for cash payments made at park entrances. Many of the internal issues facing the state park system could be addressed if department staff used available financial and programmatic data to guide decision-making. Mississippi's state park system faces competition from other state, federal, and private competitors that affect the state park system's market share of outdoor recreation enthusiasts. MDWFP and the Legislature have options available to improve existing park operations and/or to improve the economic and intrinsic value of Mississippi's state parks.

Background

The Mississippi State Legislature created the Mississippi state park system in 1934. Since 1989, the Mississippi Department of Wildlife, Fisheries, and Parks (MDWFP) has overseen the park system through its Bureau of Parks and Recreation.

The Mississippi state park system includes 25 state parks. Currently there are 21 state parks operated by the Bureau of Parks and Recreation, 3 parks operated by other governmental entities, and 1 park repurposed for use by other MDWFP bureaus.

The state park system employs 78 full-time employees and 50 contract workers.

Financial Challenges Facing the State Park System

From FY 2018 to FY 2020, state park operations incurred an average net loss of \$3,744,744 when general fund revenue is not included. State park operations are not self-sustaining without a general fund appropriation.

	FY 2018	FY 2019	FY 2020
Total Revenue	\$13,734,000	\$13,040,029	\$11,115,584
Total Expenses	\$13,701,191	\$11,921,091	\$11,368,032
Net Income (Loss)	\$32,809	\$1,118,938	(\$252,448)
Less General Fund Support	\$4,174,414	\$4,074,715	\$3,884,404
Self-Generated Net Income (Loss)	(\$ 4,141,605)	(\$2,955,777)	(\$4,136,852)

Data-Driven Decision Making

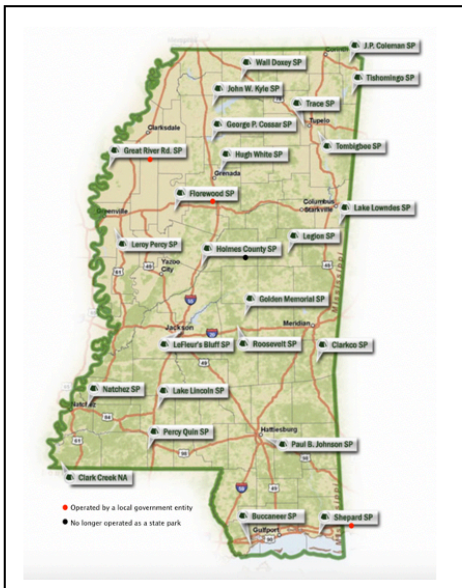
At present, MDWFP does not use available reservation data to guide either its maintenance or marketing efforts. By increasing utilization of reservation data, MDWFP could better inform its maintenance planning efforts and more strategically market underutilized amenities that represent good sources of revenue.

State Park Competition

Due to the multitude of state and federal camping opportunities in Mississippi existing outside of the state park system, 15 state parks have competition within a 15-mile radius, while 4 others have competition within a 30-mile radius.

Comparison to Neighboring State Park Systems

Neighboring state park systems employ more staff, operate more parks, and have more expenditures and self-generated revenues than Mississippi's state park system. However, these neighboring state park systems all have a dedicated revenue sources (e.g., Arkansas' 1/8 of 1 cent sales tax diversion, Alabama's cigarette tax diversion) to support park maintenance and operations.



Report Conclusions

1 State park operations are unsustainable without an annual general fund appropriation.

2 State park staff levels have declined, and the park system relies heavily on contract workers.

3 The state park system's use of honesty boxes to collect general entrance fees results in a lack of accountability of such funds.

4 The state park system does not strategically prioritize maintenance projects despite readily available data.

5 The lack of a strategic marketing plan inhibits maximizing park visitation.

6 The state park system faces internal and external competition from other parks and camping options.

Recommendations

1. MDWFP should utilize data-driven decision-making to prioritize maintenance projects compiled within the annual State Parks Capital Needs document and the park maintenance booklet.
2. The Legislature should consider directing the Department of Finance and Administration Bureau of Building to perform an updated architectural needs study and cost assessment of the state park system.
3. MDWFP should identify areas within the Bureau of Parks and Recreation that are critical staffing needs, and consider efforts to increase the number of state park employees hired as FTE PINs rather than contractual workers.
4. MDWFP should develop and implement a formal strategic marketing plan to promote the state parks. MDWFP should continue to explore methods to promote the parks, including enhancing its online presence, and track any changes in park attendance attributable to those efforts.
5. Given the potential for non-payment of entry fees as a result of the existing honesty box system at most of the state parks, MDWFP should determine whether the cost of replacing its current reservation system with staff and mechanical gate arms would be equivalent to, or less than, average honesty box systems.
6. In order to address declining general fund support and staffing levels, MDWFP should consider options to generate additional revenue and support existing park staff. Such options include, but are not limited to, upgrading the "MS State Parks" app, expanding upon public and private relationships to support the state park system, and considering contracting with private vendors for additional park amenities.
7. The Legislature could modify the current governing structure of the Mississippi state park system by removing it from the governance of MDWFP in order to strive to maximize the potential benefits of the state park system as a tourist attraction and outdoor recreational activity.

A Review of the Mississippi State Park System

Introduction

Authority

The PEER Committee, under its authority found in MISS. CODE ANN. Section 5-3-51 et seq. (1972), reviewed the Mississippi state park system to analyze the funding and operations of the park system and to identify opportunities to improve the operation of Mississippi state parks by the Mississippi Department of Wildlife, Fisheries, and Parks (MDWFP).

Scope and Purpose

PEER examined MDWFP's management operations regarding the Mississippi state park system. With recent interest by policymakers to improve and enhance Mississippi's state park system, PEER sought to:

- provide an overview of and examine the staffing levels, revenues, and expenditures of the current state park system;
- identify challenges associated with the current operation of state parks;
- identify options that MDWFP could consider to improve park operations; and,
- identify organizational and policy options that the Legislature could consider regarding how Mississippi operates its state park system.

Methodology

PEER reviewed:

- applicable state laws;
- the history of the Mississippi state park system and the agencies that have overseen it; and,
- audits of MDWFP relevant to the Mississippi state park system.

PEER also:

- interviewed MDWFP staff and park managers;
- obtained and analyzed MDWFP's Bureau of Parks and Recreation (Bureau) financial information from FY 2018 to FY 2020;
- surveyed the operations and management of the Arkansas and Tennessee state park systems;
- analyzed comparative data collected on behalf of the National Association of State Park Directors (NASPD) for the contiguous state park systems from 1984 to 2018; and,
- analyzed MDWFP's marketing efforts and its mobile applications.

Scope Limitation

Various governmental entities including the Pat Harrison Waterway District, the Pearl River Basin Development District, the Pearl River Water Valley Supply District, the U.S. Forest Service, and the U.S. Army Corps of Engineers operate parks and campgrounds throughout the state. These parks and campgrounds are not affiliated with the Mississippi state park system, and an evaluation of such parks is not included in this report.

In addition to the 25 state parks under the management of the Bureau of Parks and Recreation, the Freshwater Fisheries Bureau operates and maintains primitive and RV camping sites at 17 of its 20 state fishing lakes. MDWFP treats these campgrounds as a separate park-like operation due to a separate federal-funding stream. Therefore, PEER did not specifically review or conduct site visits at any of the state fishing lakes.

Overview of Mississippi's State Park System

This chapter includes discussion of:

- The creation, administration, and management of Mississippi's state park system; and,
- Mississippi state park locations.

The Creation, Administration, and Management of Mississippi's State Park System

The Mississippi State Legislature created the Mississippi state park system in 1934. Since 1989, MDWFP, governed by a five-member Commission, oversees the state park system through its Bureau of Parks and Recreation.

Development of a State Park System

In 1934, representatives from the National Park Service met with the Mississippi Forestry Commission to advise the State Forester that a cooperative program to develop a state park system would be possible if the state could furnish the land.

As a result, the Legislature passed House Bill 446 (Chapter 153, *General Laws 1934*) to provide for the use of state lands for state parks, while also authorizing counties to purchase land which could be conveyed to the state for park purposes. Between its creation in 1934 and 1989, the Legislature transferred oversight of the state park system to various state agencies (e.g., the Mississippi Park Commission in 1971 and the Mississippi Department of Natural Resources in 1978).

The Mississippi Executive Reorganization Act of 1989 (HB 659 - Chapter 544, *General Laws 1989*) reorganized a significant portion of state agency government. The act transferred the powers and duties of the Commission on Wildlife Conservation and the Bureau of Parks and Recreation (located within the organizational structure of the Commission on Natural Resources) to the newly created MDWFP. The act further created the Commission on Wildlife, Fisheries, and Parks to oversee the agency.

Statutory Authority for the Mississippi Commission on Wildlife, Fisheries, and Parks and MDWFP

MISS. CODE ANN. § 49-4-4 (1) (1972) created the Mississippi Commission on Wildlife, Fisheries, and Parks (Commission) to serve as the oversight and policy-making board for MDWFP. The Commission is composed of five persons appointed by the Governor, with the advice and consent of the Senate. One person is appointed from each congressional district and each member serves for a term of five years.¹

As it relates to the Mississippi state park system, the Commission must approve the general regulations governing the state park system, the fees charged for use of the state park system (e.g., entrance fees, campsite rental, cabin rental), and any promotions impacting fees MDWFP develops to promote the state park system (e.g., a hunting

¹ Because Mississippi currently only has four congressional districts and MISS. CODE ANN. § 49-4-4 (1) (1972) does not specify which five-district plan should be used for appointments, the Attorney General has opined that the last five-district plan in force and effect should be used. (See Attorney General's Opinion to Canon, January 16, 2003.)

promotion offering reduced nightly rental for a one-bedroom cabin at select parks to those with a hunting license).

In addition, MISS. CODE ANN. § 49-4-8 (1972) states that MDWFP shall have the following broad statutory powers and duties:

- a) *to conserve, manage, develop and protect the wildlife of the State of Mississippi;*
- b) *to take charge and have full jurisdiction and control over all state parks; and,*
- c) *to cooperate with other entities and agencies in developing and implementing such plans as necessary for the conservation, protection, beautification and improvement of the quality of the environment and living natural resources.*

Given the broad nature of MDWFP's statutory powers and duties, much of the detail surrounding the management, operation, and fee-setting for the state park system is found in Title 40, Part 6 of the *Mississippi Administrative Code*.

MDWFP's Bureau of Parks and Recreation

The MDWFP consists of the following six bureaus: Bureau of Parks and Recreation, Freshwater Fisheries Bureau, Law Enforcement Bureau, Museum of Natural Science Bureau, Support Services Bureau, and Wildlife Bureau. MDWFP's Bureau of Parks and Recreation is responsible for the management of Mississippi's state park system.

The Bureau of Parks and Recreation's program objectives are to provide outdoor recreational opportunities throughout the state; promote tourism; conserve historic and natural resources; and provide informational/educational seminars to promote park amenities and activities (e.g., hunter education, fishing rodeos, Archery in Mississippi events at schools).

The Bureau of Parks and Recreation consists of 165 authorized employee positions—i.e., PINs—with 78 of the PINs filled and 87 PINs vacant as of the end of FY 2020. During FY 2020, the Bureau also utilized 50 contract workers to supplement its state employee workforce. In addition, the Bureau contracts with seasonal staff on an as-needed basis.

As shown in Exhibit 1 on page 5, the Bureau consists of three groups of employees: park operations staff, the renovation and repair crew, and employees working onsite at the state parks. The exhibit provides a description of the responsibilities for each group, and the number of filled PINs and contract workers. As of October 7, 2020, 88% (113 employees) of the Bureau's filled PINs and contract workers were stationed on-site at individual state parks throughout Mississippi.

In addition, MDWFP has a support staff located at the central office that provides administrative functions to each of the six bureaus housed within the department. This central office staff supports the Bureau of Parks and Recreation by providing shared services such as information technology support, marketing support, budgeting support, and administrative support.

Exhibit 1: MDWFP’s Bureau of Parks and Recreation Staff Responsibilities and Number of Filled PINs and Contract Workers as of October 7, 2020

Employee Group	Description of Responsibilities	Location	Filled PINs	Contract Workers
Park Operations	Support park operations by processing purchase orders and tracking park expenditures; perform onboarding processes for new hires; support the reservation system by fielding calls from customers, making park reservations, and helping to resolve disputes between customers and the reservation system.	MDWFP’s Central Office in Jackson, Mississippi	5	0
Repair and Renovation Crew	Travel to individual parks for major maintenance projects and work order requests, e.g., repairing broken water lines, removing storm damage, and other projects for which additional, in-house maintenance support is needed.	Statewide	8	2
On-Site State Park Staff	Perform maintenance tasks, check in park visitors, and perform a variety of general tasks as needed.	On-site at the individual state parks	65	48
Total Filled PINs and Contract Workers			78	50

SOURCE: PEER analysis of MDWFP Organizational Chart and MDWFP submitted information.

PEER reviewed the organizational and funding structure of Mississippi’s neighboring states (i.e., Alabama, Arkansas, Louisiana, and Tennessee) to compare their state park systems with Mississippi’s. With regard to organizational structure, each of the five states organizes its state park division within varying state departments. None of the five systems operate as a stand-alone agency, but rather as agencies that include other aspects such as wildlife, conservation, and tourism.

Mississippi State Park Locations

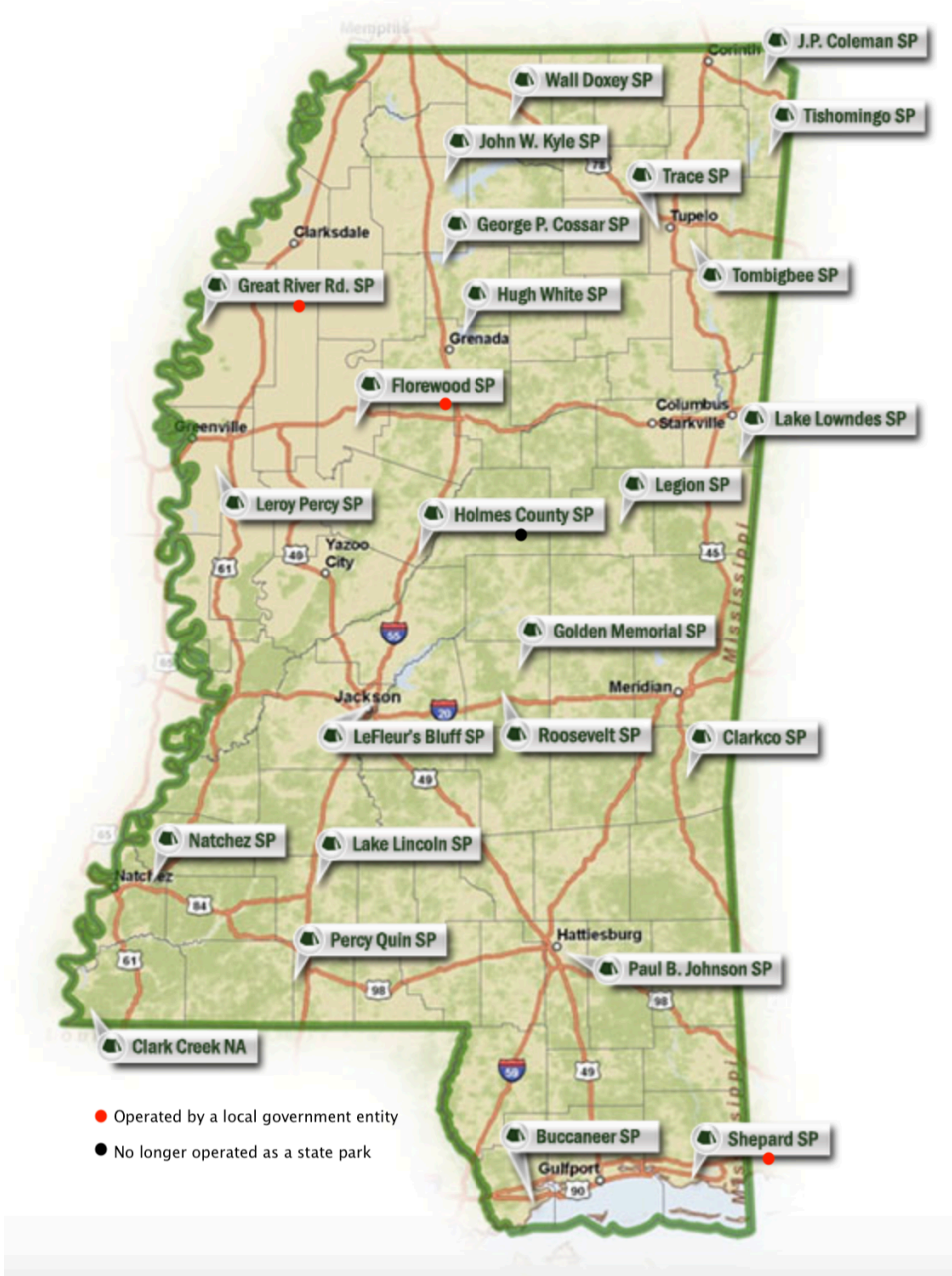
The Mississippi state park system includes 25 state parks. Currently, there are 21 state parks operated by the Bureau of Parks and Recreation, with three state parks operated by a different government entity and one park repurposed for use by other MDWFP bureaus.

As shown on the map in Exhibit 2 on page 6, the Mississippi state park system is comprised of 25 parks throughout the state. As of April 2021, MDWFP’s Bureau of Parks and Recreation operates 21 of the 25 parks. As shown on the map, Great River Road State Park, Florewood State Park, and Shepard State Park are operated by local government

entities, while MDWFP repurposed Holmes County State Park as the MDWFP Law Enforcement Training Facility and a state fishing lake.

In comparison to its neighboring states, Mississippi operates approximately the same number of state parks (20 to 25) as both Alabama (22) and Louisiana (21). However, in contrast, Tennessee and Arkansas operate over 50 state parks each.

Exhibit 2: Mississippi State Park Locations as of April 2021



SOURCE: PEER Analysis of MDWFP information and website.

Mississippi's State Park System Revenues and Expenditures

This chapter discusses:

- Mississippi state park system revenues from FY 2018 through FY 2020;
- Mississippi state park system expenditures; and,
- net income of Mississippi state parks.

Mississippi State Park System Revenues from FY 2018 through FY 2020

Annually, approximately two-thirds of total state park system revenue consists of self-generated revenue—e.g., entrance and cabin rental fees—with the remaining consisting of appropriated general funds. Although MDWFP does not have a strategic approach to increase revenues of the state park system, there are additional sources that could supplement the parks' current revenue sources.

Annually, the majority of state park system revenue (65.6%) consists of special funds generated by user fees assessed in operating the individual parks (e.g., entrance fees and rental fees). The parks also generate special fund revenue from operating their golf courses (2.2%) and other sources, such as grant programs (0.2%). The remaining state park system revenue (32%) is provided as state general funds appropriated by the Legislature.

Exhibit 3 on page 7 lists state park system revenue by source for FY 2018 through FY 2020, including a 3-year average and percentage of total revenue for each source.

Exhibit 3: Mississippi State Park System Revenue, FY 2018 to FY 2020

Revenue Source	FY 2018 (\$)	FY 2019 (\$)	FY 2020 (\$)	3-Year Average (\$)	Percent
Special Fund - Parks	8,983,935	8,698,610	7,170,202	8,284,249	65.6%
Special Fund - Golf	510,726	252,360	60,680	274,589	2.2%
Special Fund - Other	64,925	14,344	298	26,522	0.2%
General Fund	4,174,414	4,074,715	3,884,404	4,044,511	32.0%
Total Revenue	\$13,734,000	\$13,040,029	\$11,115,584	\$12,629,871	100%

SOURCE: PEER analysis of financial data submitted by MDWFP.

General fund support of Mississippi's parks declined by more than \$3 million between FY 2015 and FY 2020—e.g., \$6.9 million to \$3.8 million—and more than \$5 million from peak funding of \$9.6 million in FY 2000. Therefore, the state park system has become increasingly reliant on self-generated revenues to support park operations.

Appendix A on page 43, shows the special fund revenue generated through operation of the state parks (e.g., entrance fees, camping, sales) for FY 2018 through FY 2020. Additionally, Appendix B on page 44, provides revenues by golf course for FY 2019 through FY 2020.

Additional Sources of Park System Revenue

Although not representative of a strategic funding approach, the following financial sources are supplementing MDWFP's current funding sources.

- ***Distinctive motor vehicle tag:*** During the 2020 Regular Session, the Legislature authorized the issuance of a distinctive motor vehicle tag that supports the state park system (Senate Bill 2288, 2020 Regular Session). Each month, the Department of Revenue deposits into the Mississippi Park Fund created in MISS. CODE ANN. § 55-3-41 (1972) \$20 for each tag purchased by a Mississippi state park supporter. During an October 8, 2020, meeting of the Senate Tourism Committee, MDWFP staff projected that the state would sell 300 of the state park specialty license plates generating an estimated \$6,000 in additional revenue for the state park system during the first year of sales in FY 2021.²
- ***Hunter's Special:*** In 2014, MDWFP introduced the "Hunter's Special," which provides discounted lodging rates at state parks located near state Wildlife Management Areas and Federal National Wildlife Refuges. MDWFP advertises this special through social media and its monthly newsletter as a means of marketing state park camping experiences to hunters.

Mississippi's Neighboring State Have Dedicated Revenue Sources to Support their State Park Systems

Each of Mississippi's four neighboring states have various dedicated revenue sources to support park operations and maintenance (e.g., tax diversions, sale of license plates).

- **Arkansas:** In 1996, Arkansas citizens voted to implement a sales tax equal to 1/8 of 1 cent, to support outdoor recreational activities (e.g., state parks, hunting, fishing). Arkansas state parks receive 45% of this tax, which equates to about \$30 million per year.
- **Louisiana:** In 1989, the Louisiana Legislature approved a measure to dedicate the revenues from user fees to a fund solely for major repairs and improvements at existing parks.
- **Alabama:** Although the Alabama state park system is considered a user-funded entity, it has historically received additional state funds from cigarette and use-tax revenues, which support the park system's annual operations and maintenance programs. Cigarette tax funding accounted for \$2,618,662 in FY 2018.
- **Tennessee:** Tennessee state parks have two dedicated funding sources, which account for less than 1% of total funding. The Iris Fund Program, funded through state parks license plate sales, provides grant funds to state parks for resource management projects (e.g., erosion control, non-native plant removal). The State Land Acquisition Fund, funded through an \$.08 real estate transfer tax, provides funds for the acquisition of lands for parks and conservation efforts.

² MDWFP staff reported 198 specialty license plates have been sold as of January 20, 2021.

Mississippi State Park System Expenditures

Annually, the Mississippi state park system expends an average of \$12.3 million per fiscal year.

Approximately two-thirds of Mississippi state park system annual expenditures are costs incurred at the individual state parks (65%), while the other one-third is divided between costs incurred for MDWFP central office overhead (15.8%) and the staff at the Bureau of Parks and Recreation (14.3%). The remaining expenditures are costs incurred to operate the golf courses (2.9%) and to administer grant programs (2.0%). Exhibit 4, page 9, lists the expenditure categories for the Mississippi state park system from FY 2018 through FY 2020. On pages 9-10, following Exhibit 4, there is a brief explanation of each type of expenditure. For a detailed breakdown of each type of expenditure, see Appendix C on pages 45 through 47.

Exhibit 4: Mississippi State Park Expenditures, FY 2018 to FY 2020

Expenditure Category	FY 2018 (\$)	FY 2019 (\$)	FY 2020 (\$)	3-Year Average (\$)	Percent
MDWFP Central Office Overhead Costs	1,900,618	1,945,438	1,976,372	1,940,809	15.8%
Bureau of Parks and Recreation Operating Costs	2,420,019	1,550,244	1,329,387	1,766,550	14.3%
Park Operating Costs	8,591,898	8,006,399	7,457,555	8,018,618	65.0%
Golf Course Operating Costs	687,142	280,711	111,320	359,907	2.9%
Federal Grant-Related Costs	100,966	138,299	493,398	244,221	2.0%
Total Expenses	\$13,701,191	\$11,921,091	\$11,368,032	\$12,330,105	100%

SOURCE: PEER analysis of financial data submitted by MDWFP.

MDWFP Central Office Overhead Expenditures:

MDWFP overhead costs associated with operating the Mississippi state park system include: salaries of shared administrative and support staff (e.g., budget director, human resources, IT, marketing, agency administration); contractual costs (e.g., Mississippi Department of Information Technology Services, Mississippi Management and Reporting System, Workers Compensation, Unemployment Insurance) related to the park system; and commodities.

Bureau of Parks and Recreation Operating Expenditures:

Bureau of Parks and Recreation expenditures include costs for administrative staff, management staff, and the renovation and repair crew.

Park Operating Expenditures:

The majority of park operating expenditures are attributed to direct labor costs, including salaries for park employees and contractual costs for seasonal workers. Other operating expenditures include but are not limited to equipment, repair and maintenance services, utilities, and building and floor space rental.

Golf Course Expenditures:

MDWFP is responsible for the expenditures of the 9-hole golf course at LeFleur's Bluff.

Federal Grant-Related Expenditures:

MDWFP's Bureau of Parks and Recreation is the state entity responsible for managing and disbursing federal funds associated with the federal Recreational Trails Program (RTP) Grant and the Land Water Conservation (LWC) Grant.

Net Income of Mississippi State Parks

When considering direct revenues and direct expenditures for each park facility, only five of the bureau's 25 facilities generated more revenues than expenditures during fiscal years 2018 through 2020.

PEER examined MDWFP's financial information to determine the net income status for each of the bureau's state parks. As shown in Exhibit 5, pages 10-11, total revenues represent the direct self-generated funds for each park (e.g., overnight rentals, camping) and the total expenditures represent the direct costs associated with the day-to-day operations for each park (e.g., salaries, utilities). When considering direct revenues and direct expenditures, only five of the bureau's 25 facilities generated more revenues than expenditures for fiscal years 2018 through 2020.

Exhibit 5: Net Income Ranking for MDWFP State Parks, FY 2018 through FY 2020

State Park	FY 2018 (\$)	FY 2019 (\$)	FY 2020 (\$)¹,²	3-Year Average (\$)
Buccaneer	337,453	449,403	150,289	312,382
Paul B. Johnson	219,269	268,223	127,404	204,965
JP Coleman	236,132	257,840	4,264	166,079
Clarkco	102,771	130,819	71,025	101,538
Lake Lincoln	41,738	65,540	33,355	46,878
LeFleur's Bluff	184,310	(4,757)	(55,289)	41,421
Percy Quin	41,192	160,598	(209,105)	(2,438)
Great River Road³	(5,076)	(12,175)	(3,054)	(6,769)
Natchez	(2,823)	(4,372)	(17,389)	(8,195)
Golden Memorial	(52,873)	(25,038)	(21,524)	(33,145)
Clark Creek	(52,447)	(31,557)	(29,117)	(37,707)
Trace	(60,298)	(49,561)	(25,893)	(45,251)
George P. Cossar	(10,615)	(80,840)	(66,032)	(52,496)
John W. Kyle	5,633	17,766	(194,278)	(56,960)
Lake Lowndes	(31,331)	(50,762)	(92,368)	(58,154)
Tombigbee	(61,659)	(18,674)	(99,105)	(59,813)
Hugh White	(42,010)	(5,380)	(180,896)	(76,096)
Legion	(79,975)	(69,961)	(91,515)	(80,484)
Roosevelt	(48,121)	(40,940)	(152,925)	(80,662)
Wall Doxey	(76,380)	(101,805)	(96,234)	(91,473)
Tishomingo	(134,531)	(80,069)	(98,066)	(104,222)
Leroy Percy	(120,603)	(93,240)	(106,304)	(106,716)
Shepard⁴	0	9,613	(741)	2,957

Holmes County ⁵	(182)	(68)	2,815	855
Florewood ⁶	0	0	0	0
Net Total	389,574	690,603	(1,150,683)	(23,503)

¹ Due to concerns related to COVID-19, MDWFP closed all state parks on March 16, 2020, before beginning a phased reopening on May 7, 2020.

² During FY 2020, MDWFP collected \$863,341 in reservation revenue under the “park operations” category rather than allocating those revenues to individual parks, due to the necessity to be able to centrally issue refunds in the event of higher-than-normal cancellations due to the COVID-19 pandemic.

³ Converted to day-use only during FY 2018-2020. MDWFP does not charge entrance fees to the park. Leased to the City of Rosedale as of April 2021.

⁴ Operated by the City of Gautier.

⁵ Converted to a MDWFP training facility and state fishing lake.

⁶ Currently being leased to the LeFlore County Board of Supervisors.

SOURCE: PEER analysis of information submitted by MDWFP.

Impact of COVID-19 on the Net Income of Mississippi’s State Parks

Due to concerns related to COVID-19, MDWFP closed all state parks on March 16, 2020, before beginning a phased reopening on May 7, 2020. This adversely impacted state park operations. For example, two state parks (Percy Quin and John Kyle) generated positive net income in fiscal years 2018 and 2019, before operating at a deficit in FY 2020, in part due to COVID-19.

Although MDWFP authorized the state parks to resume park operations on May 7, 2020, MDWFP continued to prohibit the renting of group camp facilities, banquet/meeting room facilities, and motel rooms. All park pools were closed during the summer. MDWFP also currently restricts cabin rentals to four nights per week (Thursday through Sunday) to allow for cleaning and limits the renting of any duplex cabin to one of the two units (unless both parties are together).

Due, in part, to the loss in revenue in FY 2020 resulting from state park closures, MDWFP averaged a deficit of \$23,503 per year from FY 2018 to FY 2020.

State Park Operations Unsustainable without an Annual General Fund Appropriation from the Legislature

From FY 2018 to FY 2020, state park operations generated an average net loss of \$3,744,744 when general fund revenue is not included. Therefore, state park operations are not self-sustaining without a general fund appropriation.

State park operations would not be sustainable without a general fund appropriation each year. Excluding state general fund support, for fiscal years 2018 through 2020 the state park system’s expenditures exceeded self-generated revenues each year. Exhibit 6, page 12, shows MDWFP’s Bureau of Parks and Recreation’s total revenues (self-generated and state general fund support) and total expenditures for fiscal years 2018 through 2020. As shown in the exhibit, when the Bureau’s general fund support is excluded, the Bureau experienced an operating deficit in each of the fiscal years—i.e., self-generated revenues were not sufficient to sustain its operations.

Exhibit 6: Mississippi State Park System Total Revenues and Expenditures, FY 2018 to FY 2020

	FY 2018 (\$)	FY 2019 (\$)	FY 2020 (\$)
Total Revenue*	13,734,000	13,040,029	11,115,584
Total Expenses	13,701,191	11,921,091	11,368,032
Net Income (Loss)	32,809	1,118,938	(252,448)
Less General Fund Support	4,174,414	4,074,715	3,884,404
Self-Generated Net Income (Loss)	(4,141,605)	(2,955,777)	(4,136,852)

*NOTE: Total revenue includes all self-generated special funds and state general fund support.

SOURCE: PEER analysis of financial data submitted by MDWFP.

Mississippi's State Park Operating Expenditures Are Two to Seven Times Less than in Neighboring States

The Mississippi state park system's operating expenditures totaled just under \$14 million in FY 2018 and \$13.2 million in FY 2019. Comparatively, neighboring park systems spent two to seven times more than Mississippi, with Louisiana expending \$29 million in FY 2018 and FY 2019, and Tennessee spending \$96 and \$90 million in FY 2018 and FY 2019 respectively.

Mississippi spends anywhere from two to seven times less than its neighboring states to operate its state parks. This could be attributed to the fact that the Mississippi state park system includes fewer parks and land acres to manage, and offers fewer amenities in comparison to its neighboring states.

Exhibit 7 on page 12 illustrates the variance in the expenditures of each of the five state park systems for FY 2018 to FY 2019.

Exhibit 7: Surrounding State Operating Expenditures, FY 2018 to FY 2019

Operating Expenditures	Mississippi	Alabama	Arkansas	Louisiana	Tennessee
FY 2018 (\$)	13,969,731	41,662,724	63,431,812	29,033,352	96,390,592
FY 2019 (\$)	13,275,689	41,567,644	74,802,779	29,214,488	90,884,500

SOURCE: PEER analysis of MDWFP financial records and the NASPD AIX.

Mississippi's expenditures are much lower than all four of its neighboring states. State park system operating expenditures in Louisiana are more than two times that of Mississippi, while Tennessee state park expenditures are almost seven times that of Mississippi.

The reasons for such differences in expenditures are clearest when comparing both the number of parks and land acres each respective system manages. For example, the Alabama state park system manages as many parks as Mississippi,

but its territory is double the size of the Mississippi state park system (48,470 acres managed in Alabama versus 23,620 acres in Mississippi). Tennessee’s state park system manages twice as many parks as Mississippi and seven times as many acres (56 parks and 177,521 acres in Tennessee versus 25 parks and 23,620 acres in Mississippi).

Neighboring State Park Systems Generate More Revenue than Mississippi

During FY 2018 and FY 2019, neighboring states generated between \$1 million (Louisiana) to \$33 million (Tennessee) more than Mississippi’s parks.

Mississippi’s neighboring park systems’ self-generated revenue exceeds the Mississippi state park system’s self-generated revenue by amounts ranging from \$1 million to \$33 million during FY 2018 and FY 2019.

Exhibit 8 on page 13 illustrates the variance in the self-generated revenues of each of the five state park systems for FY 2018 to FY 2019.

Exhibit 8: Surrounding State Self-Generated Revenues, FY 2018 to 2019

Self-Generated Revenue	Mississippi	Alabama	Arkansas	Louisiana	Tennessee
FY 2018 (\$)	9,798,317	38,194,560	28,388,852	10,915,966	42,924,100
FY 2019 (\$)	9,200,974	38,101,713	28,319,326	10,281,298	42,205,058

SOURCE: PEER analysis of MDWFP financial records and the NASPD AIX.

The Mississippi state park system generated less revenue in FY 2018 and FY 2019 than both Alabama and Louisiana, despite operating a similar number of state parks.

However, while each surrounding state park system operates at a net loss when comparing expenditures with self-generated revenues, only Alabama presents a comparable net loss to Mississippi. Arkansas, Louisiana, and Tennessee all generate a larger net loss when comparing self-generated revenues with operating expenditures. As such, when comparing solely self-generated revenues with operating expenditures, Mississippi is closer to having self-generated revenues cover operating expenditures than any neighboring state, excluding Alabama.

MDWFP’s Bureau of Parks and Recreation’s Decline in Staffing Levels, Staff Shortages, and Reliance on Contract Worker Positions

This chapter discusses:

- the Bureau of Parks and Recreation’s decline in staffing levels; and,
- high vacancy rates for authorized PINs and reliance on contract worker positions.

Bureau of Parks and Recreation’s Decline in Staffing Levels

From FY 2015 to FY 2020, authorized positions allocated to the Bureau of Parks and Recreation declined from 193 to 165.

According to MDWFP staff, the number of authorized positions—i.e., PINs—allocated to the Bureau of Parks and Recreation has been declining over the past two decades. Between FY 2015 and FY 2020, the number of PINs declined from 193 to 165 (see Exhibit 9 on page 14). Such a decline is a national phenomenon as reported by the Utah State University Institute of Outdoor Recreation and Tourism that concluded that, nationally, state park labor has been trending downward after reaching a peak in the mid-2000s.³

Exhibit 9: MDWFP’s Bureau of Parks and Recreation General Fund Support and PINs, FY 2015 to FY 2020

Fiscal Year	PINs
2015	193
2016	193
2017	193
2018	169
2019	163
2020	165

SOURCE: PEER analysis of MDWFP’s FY 2017 through FY 2021 Budget Requests, as they pertain to MDWFP’s Bureau of Parks and Recreation.

³ Utah State University’s Institute of Outdoor Recreation and Tourism prepared the “2019 Outlook and Analysis Letter: The Vital Statistics of America’s State Park Systems (February 2020)” for the National Association of State Park Directors to detail historical trends and provide an understanding of future trends in key metrics for state park systems.

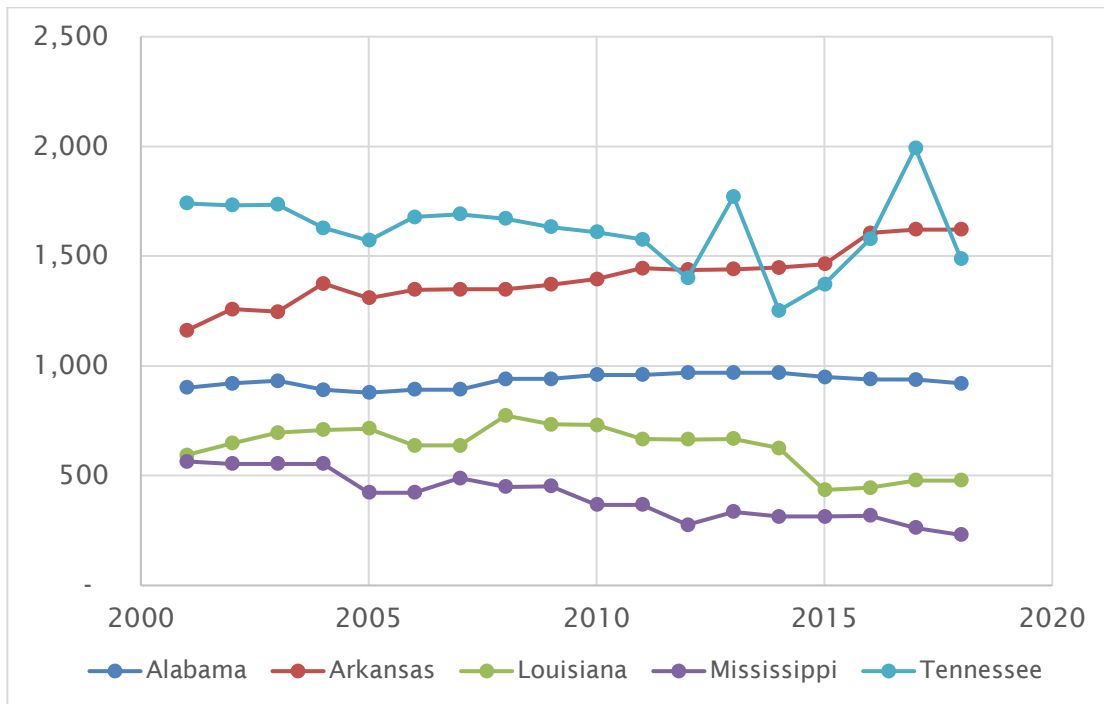
Mississippi's Staffing Levels Compared to Its Neighboring States

While there is no consistent trend amongst neighboring state park system staffing levels, neighboring state park systems consistently operate with more staff than Mississippi.

The National Association of State Park Directors (NASPD) Annual Information Exchange (AIX), the source for much of the comparative data utilized throughout the report, does not make distinctions between state PIN full-time employees (FTEs) and contract workers. Rather, in its 2018 to 2019 Data Report, the NASPD AIX categorized staff as full-time, part-time, and seasonal. As a result of this classification system, the numbers of state park staff presented in Exhibit 10 include all labor sources, not only state-service FTEs.

Mississippi's state park system workforce ranges from about one-half to one-sixth the size of the workforce of state park systems in Mississippi's neighboring states. Exhibit 10 on page 15 compares the staffing levels at Mississippi's state parks and state parks located in Alabama, Arkansas, Louisiana, and Tennessee from 2001 to 2018.

Exhibit 10: State Park System Staffing Levels for Mississippi and its Neighboring States from Calendar Year 2001 to 2018



SOURCE: NASPD AIX 2018-19 Data Report.

There is not a single consistent trend regarding staffing levels at the state park systems reviewed by PEER. Only Arkansas has exhibited a consistent growth in state park personnel, which increased from 1,161 in 2001 to 1,621 in 2018 (28%). Alabama's state park personnel have remained flat at around 900 since 2001.

Staffing levels in Mississippi have decreased by more than half since 2001. In 2001, MDWFP operated the Mississippi state park system with more than 500 employees but employed only 230 people in 2018.

Significantly lower staffing levels in the Mississippi state park system can be attributed to several reasons. Mississippi has the lowest state park system attendance of the compared states. Lower attendance numbers and decreasing revenue collected has led MDWFP to steadily reduce state park personnel or not fill PINs once they are vacated (discussed on page 16). In addition, Mississippi state parks offer fewer amenities, and thus less staff to support those amenities. Mississippi also has fewer parks and less land acreage to manage, requiring less staff to manage and maintain the parks.

High Vacancy Rates for Authorized PINs and Reliance on Contract Worker Positions

Along with the declining number of authorized PINs, the Bureau of Parks and Recreation has a high vacancy rate, requiring the Bureau to rely on contract workers to supplement the state employee workforce and requiring on-site park employees to perform tasks typically not required of their positions.

In addition to a declining number of authorized PINs, the Bureau of Parks and Recreation has experienced a high vacancy rate with a majority of the authorized positions going unfilled. As stated on page 4, 87 of the Bureau's 165 authorized PINs were vacant as of June 30, 2020, a vacancy rate of 53%. According to the Mississippi State Personnel Board (MSPB) staff, 61 of the 87 vacant PINs had been vacant since 2018 with some vacancies dating as far back as 2012. Exhibit 11, page 16, shows the occupational class and the number of authorized PINs that were vacant on June 30, 2020.

Exhibit 11: MDWFP Bureau of Parks and Recreation FTE PIN Vacancies by Occupational Class, as of October 7, 2020

Category	Vacant PINs (#)
Park Worker	41
Park Assistant Manager	16
Facilities Maintenance	8
Park Administrator	7
Park Manager	7
Park Worker Supervisor	5
Staff Officer	2
Office Director	1
Total	87

SOURCE: PEER analysis of information submitted by MSPB, as of June 30, 2020.

MDWFP currently relies heavily on the use of contract workers to perform the job responsibilities of the 87 vacant PINs. According to MDWFP, due to funding considerations and the level of pay it is able to offer to newly hired FTE PIN employees, typically, when an individual in an authorized PIN leaves the Bureau's employment—i.e., retires, takes

another job—the Bureau has not hired another individual to fill the vacant PIN. Rather, the Bureau has chosen to enter into a contract to work with an individual. As a result of this practice, approximately 39% of the Bureau’s total workforce—128 persons—consists of contract workers, typically assigned to the individual state parks.

Advantages and Disadvantages of Utilizing Contract Workers

Although contract workers offer certain advantages, such as offering a less costly labor source compared to hiring a PIN employee, contract workers can create a “revolving door” within an organization and increase training overhead and management time dedicated to hiring and onboarding contract employees.

There are some advantages to utilizing contract workers. For example, a contract worker is less costly than a state employee in an authorized PIN because of lower wages and/or fewer costs associated with any fringe benefits. Utilization of contract workers also allows MDWFP to better address the changing size of its workforce. When funding is available, MDWFP is able to employ additional contract workers. In turn, when funding is scarce, MDWFP is able to reduce the number of contractual workers.

However, there are also disadvantages to utilizing contract workers rather than hiring full-time employees. For example, according to an article from *Recruitment.com*, contract employees can create a “revolving door” within an organization, and “training overhead and management time can make [hiring contractors] inefficient.”⁴ Further, the article notes that the benefit of hiring full-time employees “is that they grow with the company. Long-term employees become embedded in the organizational culture, develop company-specific skills, and prepare for better performance in upper management positions while enjoying job security in the process,” a benefit that contractors don’t provide according to management professors at the Wharton School at the University of Pennsylvania.^{4,5}

Challenges Associated with Hiring and Retaining Employees

MDWFP has stated that it can prove difficult to hire and retain employees based on the levels of pay available to new hires. However, by hiring contract workers rather than an FTE employee, FTE employees are left to perform tasks that are needed to keep parks functioning, although the performance of these tasks would otherwise not be normally required based on their job descriptions.

MDWFP staff stated that many of the Bureau’s vacant PINs have remained unfilled because it is difficult to hire and retain employees at the respective levels of pay based on the position type. In addition, as noted earlier on page 7, the amount of general fund support has decreased over the years, which MDWFP primarily utilizes for employee salaries. In FY 2020, MDWFP allocated approximately \$3.1 million (80%) of its total general fund support towards the 78 filled FTE PINs within the Bureau of Parks and Recreation, and approximately \$231,000 (6%) towards contractual workers.

In addition, the uncertainty of the amount of revenue MDWFP will generate in special funds inhibits MDWFP from having a dependable revenue source to fill all

⁴ Albright, Dann. “The Hard Choice Between Contractors and Full-Time Employees.” *The Future of Recruiting*, *Recruitment.com*, December, 2019.

⁵ Wharton School, University of Pennsylvania. “Is the Rise of Contract Workers Killing Upward Mobility?” *Knowledge @ Wharton*, October 2, 2017. <https://knowledge.wharton.upenn.edu/article/the-perils-of-contract-workers/>

165 authorized PINs with an FTE employee. In FY 2020, MDWFP allocated approximately \$1.1 million in special fund revenue towards the 50 contractual workers within the Bureau of Parks and Recreation.

Another challenge in park operations is that when MDWFP replaces an FTE employee with a contract worker, the job responsibilities may not be equivalent based on the FTE PIN. For example, when a park manager vacancy occurs MDWFP may utilize those funds to hire a contract worker to perform other responsibilities. This results in FTE state park employees performing job duties that normally their positions would not be expected to perform. The following are examples PEER documented during site inspections at six state parks:

- Park managers dedicate most of their working hours to performing maintenance needed to keep parks functioning day-to-day (e.g., repairing sewer systems, mowing lawns at the parks), preventing them from performing managerial-type duties.
- Park employees are unable to staff the entrance gate at state parks full-time and collect entrance fee revenue to support the state park system because they have to clean and maintain other park facilities.
- Park managers have increasingly relied on volunteer labor and resources to complete enhancements to amenities (e.g., improvements to and maintenance performed on nature trails) that could increase park visitation and visitor satisfaction.

Based on inspections of six state parks sampled by PEER, park employees spend the majority of their time reacting to maintenance needs, checking in guests, and cleaning facilities—essential tasks needed for the parks to continue operating at a basic level. However, this leaves park employees to maintain the status quo, and effectively inhibits park managers from proactively seeking methods by which to improve the park visitor experience.

Internal Issues Associated with Mississippi's State Parks

PEER sought to identify any additional challenges in the operation of the Mississippi state park system. Based on both a review of the information provided by MDWFP and an onsite assessment of a random sample of state parks, PEER identified the following:

- a lack of accountability regarding honesty box funds;
- a lack of strategic prioritization of capital and maintenance needs; and,
- a lack of a strategic marketing plan inhibits maximizing park visitation.

The following sections describe the above-mentioned challenges in more detail.

A Lack of Accountability Regarding Honesty Box Funds

The Bureau of Parks and Recreation's use of honesty boxes to collect entrance and user fees at the majority of state parks results in a lack of accountability of such funds.

The Mississippi Commission on Wildlife, Fisheries, and Parks has established entrance fees and user fees to support state park system operations within its general regulations (last revised in September 2017). Entrance fees, as visibly posted on signs at each park entrance, are as follows:

- private vehicles - \$4, plus 50 cents per person over 4 people;
- motor cycles - \$4;
- boats - \$7 (includes boat launch and vehicle entrance fee); and,
- buses - 50 cents per person.

There are also user fees established within these general regulations for other park structures and amenities, such as athletic field rental (e.g., \$6 per hour to \$50 per field), outdoor pavilion rental (e.g., \$40 to \$200 per day), and cabins (e.g., \$60-110 per night).

Nine state parks currently operate gatehouses year-round, while the other 13 state parks have no staff or mechanism to monitor park entrances.⁶ These 13 parks utilize an honor system—e.g., an honesty box—to collect entry fees for the park and user fees to launch a boat or rent a park amenity.

In order to enter a state park system for day-use, to launch a boat into a state park lake, or to rent a park amenity using the honesty box system, visitors are required to pay the established fee posted at the park entrance by either placing money directly into a locked honesty box at the park entrance, or placing the money into an envelope provided by the box and placing the envelope into the honesty box.

Although the Bureau of Parks and Recreation relies on the honesty box system at certain state parks to collect entry and user fees, the Bureau has no assurance that all visitors

⁶ LeFleur's Bluff State Park operates on the *Camp Life* reservation system with a mechanical gate entrance. Buccaneer, Lake Lincoln, Lake Lowndes, Legion, Natchez, Percy Quin, Tishomingo, and Trace State Parks operate staffed gatehouses year-round.

actually pay the required fees absent a gatehouse staffed with a park employee. Park staff reported to PEER that they have observed park visitors using park amenities, such as pavilions or athletic fields, without paying a user fee either because the visitor did not know a fee was required or simply because the visitor did not place the required fee amount in the honesty box.

Currently, approximately 88% of the Bureau's revenue is collected through direct payments, usually in the form of credit card payments for camping, cabin rental, and annual park permits for general entrance, horse trail riding, and outdoor recreational vehicle use. Because these direct payments are auditable, the Bureau can account for the revenue by source and activity in its financial records. A portion of the remaining 12% of the Bureau's revenue is received through the parks' honesty boxes, but is difficult to classify in the Bureau's accounting records. For example, if a park manager empties an honesty box and finds \$4 cash in the box with no written documentation, the manager could conclude that the cash was placed in the box as an entry fee because an entry fee is \$4. However, if the manager empties the box and finds \$15 in the box with no written documentation, the manager has no basis to know the category of fees represented by the cash and cannot accurately classify it in the Bureau's financial records. More importantly, a park manager, because the honesty box collection process relies on the honesty of park users, has no certainty that all fees have been properly paid.

The remaining portion of the Bureau's revenues not collected through direct payments or honesty boxes consists primarily of categories of fees that are difficult to classify in the financial records—e.g., one-time boating fees versus annual boating fees; daily marina use versus monthly marina use, etc. Based on revenue information available to PEER, Appendix E, page 52, describes the Bureau's park operation revenues for fiscal years 2018 to 2020.

Because the Bureau of Parks and Recreation is heavily dependent on its self-generated special fund revenue for its operations, it is imperative that all required fees be collected and properly accounted for in the Bureau's financial records. Without such accounting, the Bureau cannot accurately determine the number of park visitors and cannot determine the utilization of park amenities.

As of November 2020, MDWFP was developing a request for proposals (RFP) to be released during 2021 for a new reservation system. MDWFP plans for the RFP to include a proposal for security gates and kiosks as a means by which to monitor visitor entrance into state parks and the collection of required fees, without requiring park employees to assume additional responsibilities.

A Lack of Strategic Prioritization of Capital and Maintenance Needs

As of July 2020, the Bureau of Parks and Recreation identified approximately \$95 million in capital improvements within the state park system and an unquantified value of maintenance needs within the individual parks. However, the Bureau lacks a strategy to prioritize and accomplish the projects, despite readily available data on state park occupancy and rental rates.

To memorialize the capital improvement and maintenance needs of state parks, Bureau of Parks and Recreation staff maintains two documents: the annual *State Parks Capital Needs* document and the park maintenance booklet.

- ***State Parks Capital Needs* document:** The Bureau's *FY 2021 State Parks Capital Needs* document describes 24 projects with an estimated cost of approximately \$95 million. The projects range from repair and renovation of existing infrastructure (e.g., dams, spillways, cabins) to new construction and amenity projects (e.g., RV campgrounds, bathhouses). To compile the annual *State Parks*

Capital Needs document, Bureau staff annually conducts a self-assessment of park facilities. Although compiled annually, the document typically contains projects that are carried over from year to year because they were not begun or completed as planned, primarily due to budgetary challenges.

With regard to capital needs, in 2012 the Department of Finance and Administration's Bureau of Buildings conducted an architectural study on four of the Bureau's state parks: J.P. Coleman, Paul B. Johnson, Percy Quin, and Roosevelt state parks. The study identified and estimated that the capital needs at Paul B. Johnson State Park alone would total approximately \$26.4 million to complete (excluding Roosevelt due to a lack of available cost estimates).

- **Park maintenance booklet:** Annually, the individual park managers conduct self-assessments of maintenance projects (e.g., cabin furnishings, roof repair, road repair) within their parks to consolidate the projects into a comprehensive park maintenance booklet. While the managers identify maintenance projects, the booklet does not include cost estimates for completing the projects. Projects included in the booklet are reviewed by MDWFP central office staff for possible inclusion in the *State Parks Capital Needs* document.

PEER reviewed both the *State Parks Capital Needs* document and park maintenance booklet and concluded that the Bureau has no strategy to prioritize capital or maintenance needs of the parks. While Bureau staff contend that they categorize the parks' capital from most- to least-pressing, the *State Parks Capital Needs* document does not reflect such categorization, with the document simply being a conglomeration of projects considered to be necessary for the continued operation of the parks. The following are examples of projects included in the document:

- construction of 70 new RV campground sites at LeFleur's Bluff for an estimated cost of \$5,631,816;
- replacing a bathhouse at Lake Lowndes for an estimated cost of \$682,344; and,
- repair and renovation of RV campgrounds at nine state parks because "camping provides a good source of revenue production" for an estimated cost of \$22,168,057.

The Government Finance Officers Association (GFOA) notes that lacking investment in capital assets "makes it increasingly difficult to sustain the asset in a condition necessary to provide expected service levels. Ultimately deferring essential maintenance or asset replacement could reduce the organization's ability to provide services," and "deferring maintenance and/or replacement could increase long-term costs and liabilities."⁷ Since the state park system has become increasingly reliant on self-generated revenues to support park operations, it is imperative that MDWFP prioritize these capital needs in order to utilize available funds in the most efficient and effective manner.

Using Available Data to Prioritize Capital Improvement Needs

Although MDWFP has access to informative data that detail the usage rate of each park campsite, cabin, etc., the FY 2021 State Parks Capital Needs document does not use that available data to strategically prioritize projects to expand amenities at certain state parks.

PEER identified instances where MDWFP's Bureau of Parks and Recreation has available data sources to help prioritize capital improvement needs. However, MDWFP has not fully utilized such information (i.e., reservation data) in

⁷ Government Finance Officers Association, "Best Practices: Capital Asset Management."

addressing capital improvements, such as the plans to expand RV camping at various parks.

The FY 2021 *State Parks Capital Needs* document includes two projects that would create 30 new RV camping sites at both Paul B. Johnson and Percy Quin State Parks (\$4.75 million), as well as 70 new RV camping sites at LeFleur’s Bluff State Park (\$5.63 million). This represents approximately \$10.4 million of the \$95 million in projects within the *State Parks Capital Needs* document.

MDWFP contends that the construction of new RV sites is particularly important to drive revenue due to increased demand, considering that RV camping accounted for approximately 51% of annual revenue during FY 2020. At LeFleur’s Bluff State Park, RV camping accounts for approximately 67% of total park revenue from FY 2018 through FY 2020, while RV camping accounts for 57% of total revenues at Paul B. Johnson State Park, and 23% of total revenues at Percy Quin State Park during the same time period.

While a large portion of revenue is generated at these three parks from RV camping, making the decision to expand these campsites solely on that information alone may not be in the best interest to the state park system as a whole. For example, the project justification field in FY 2021 *State Parks Capital Needs* document for the 70 proposed new RV campsites at LeFleur’s Bluff states:

Camping demand has increased. Camping is a good revenue source.

MDWFP staff stated that new amenities or projects within the FY 2021 *State Parks Capital Needs* document typically are included for those parks with a positive net income and enhance those parks that are generating revenue.

MDWFP has the ability to generate various reports using reservation data from the *Reserve America* reservation system utilized by most state parks, but MDWFP staff state that they do not use that data to drive decision-making processes.⁸ These reports can provide details as specific as the number of times a particular campsite was occupied. Exhibit 12 on page 22 provides an occupancy summary for the campsites in FY 2020 at the three state parks where expansion of RV camping is proposed in the FY 2021 *State Parks Capital Needs* document.

Exhibit 12: FY 2020 Average Occupancy and Percent of Total Revenue at LeFleur’s Bluff, Paul B. Johnson, and Percy Quin State Parks

State Park	Current Number of RV Campsites	Proposed New RV Campsites	Average Occupancy	% of FY 2020 Revenue
LeFleur’s Bluff	28	70	40%	67%
Paul B. Johnson	125	30	52%	57%
Percy Quin	100	30	42%	23%

SOURCE: PEER analysis of MDWFP-generated reservation data reports.

⁸ LeFleur’s Bluff State Park currently utilizes the *Camp Life* reservation system and an accompanying mechanical gate arm to control traffic in and out of the park.

The FY 2021 *State Parks Capital Needs* document estimates a total cost of approximately \$10.4 million for these 130 new RV campsites, which would average approximately \$80,000 per RV campsite. When looking at both the revenue and occupancy data, it is unclear to PEER how MDWFP determined the number of proposed new RV campsites to add at each park. For example, while the average occupancy rates are similar among the three parks, RV campsites account for only 23% of total revenue in FY 2020 at Percy Quin State Park.

Determining the return on investment (ROI) using the estimated cost per RV campsite for each of the parks would allow MDWFP to better utilize available funding and maximize existing resources. If MDWFP can adequately justify why such an expansion would be beneficial to the state park system by backing up claims with available data (e.g., during the summer months the RV camping sites are consistently full at these three parks), a \$10.4 million cost could become more justifiable. Looking at the ROI for each campsite at each park could also allow MDWFP to better determine if the number of proposed new RV campsites appropriately maximize revenue collected at each of the parks, or if MDWFP should prioritize other capital needs.

A Lack of a Strategic Marketing Plan Inhibits Maximizing Park Visitation

The MDWFP's central office controls all aspects of departmental marketing and does not have a strategic destination marketing plan to increase utilization of state parks. In addition, the Bureau of Parks and Recreation does not analyze available booking and reservation data to inform potential marketing decisions.

Although MDWFP utilizes an in-house marketing team, consisting of a graphic designer, a magazine editor, two camera operators, a marketing specialist, and a social media specialist, to handle marketing for all of the department's bureaus, MDWFP does not have a strategic marketing plan for the Bureau of Parks and Recreation. In the absence of a formal marketing plan, park managers rely on ad hoc email campaigns to market the amenities of their particular parks. For example, in order to attempt to fill campsite/cabin vacancies, park managers will sometimes email individuals who previously visited the park around the same time of year to inform those previous visitors of such vacancies.

A strategic marketing plan should provide MDWFP with a detailed framework to systematically target its marketing efforts to support the mission and vision of the agency. This plan should also support the goals and objectives for each bureau within MDWFP, such as the Bureau of Parks and Recreation, to maintain a state park system as a cost-effective destination for recreational opportunities for Mississippians and other guests. The strategic marketing plan should also be periodically reviewed and updated based on extensive visitor research.

A strategic plan for destination marketing—i.e., to market the state's parks system—should be comprised of the following key elements:

- an analysis of the current marketing strategies to identify any strengths and weaknesses of current marketing efforts;
- a stakeholder analysis that details the existing target markets based on park visitation data (e.g., utilization, customer satisfaction surveys) and identifies opportunities for new potential markets;

- strategies based on marketing research to promote the state park system as a destination and be successfully attract visitors to state parks in lieu of competition for outdoor recreational activities;
- an implementation timeline on how, and when, the marketing strategy and any actions or efforts will be executed, as well as who is responsible for each; and,
- a marketing budget that accounts for the expenditures of any marketing efforts, by MDWFP (i.e., bureau).

Without a strategy that incorporates specific actions as to how to best market state parks to a specific audience of potential visitors, MDWFP and the state park system are left with a patchwork approach to increase park visitation.

Currently, most of MDWFP's marketing efforts are designed to promote the department as a whole, not targeted specifically towards the state park system. Some examples of current MDWFP marketing efforts include:

- producing the *Mississippi Outdoors* television program that showcases statewide outdoor recreational opportunities, which occasionally features a segment regarding a state park;
- producing a *Mississippi Outdoors* radio segment on SuperTalk Mississippi, that showcases statewide outdoor recreational opportunities and sometimes features park managers speaking about their state park;
- partnering with Visit Mississippi (the tourism division of the Mississippi Development Authority) to promote state parks through trade shows (e.g., the Crappie Expo, and Travel & Adventure Show); and,
- various social media efforts, including a Facebook and Instagram account, that sometimes feature information and images from the state park system.

The department's marketing efforts geared specifically to the state park system involve each park's respective webpage within the MDWFP website and the mobile "MS State Parks" app. The app allows the public to make lodging reservations at a state park and learn about a park's amenities from their smartphone. Individual park managers are responsible for submitting content (e.g., images, news, events) to the central MDWFP office for approval to be posted on the MDWFP website. MDWFP staff tracks the number of visits to each respective state park's webpage within the MDWFP website and the number of times the app is downloaded.

Using Park Visitation Data to Drive Marketing Efforts

By using park visitation data available through the Reserve America reservation system, MDWFP could develop a plan to strategically market state parks to the public and attempt to increase the use of underutilized amenities that represent good sources of revenue (e.g., pavilions, ball fields).

One source of data that the Bureau of Parks and Recreation could use to develop a strategic marketing plan is each state park's annual occupancy report and other visitation data. MDWFP obtains occupancy reports through the information input into the *Reserve America* reservation system (or the *Camp Life* reservation system in the case of LeFleur's Bluff State Park) as a result of online, over-the-phone, or on-site bookings.

Each state park's occupancy report identifies the usage rates for each cabin, motel room, and campsite (either premium, standard, or primitive), each pavilion, and each meeting room subject to reservation requirements. Additional occupancy data may also be obtained through the *Reserve America* reservation system, including the rate at which a particular facility was booked during weekday nights

(Monday through Thursday) versus booked during the weekend (Friday through Sunday) or the average length of stay.

MDWFP staff reported to PEER that while data is collected as part of the reservation and booking process, Bureau staff do not use the occupancy reports or data for any analytical purposes (i.e., as a gauge in which to assess state park operations, facility demand, and where resources should be allocated). Therefore, Bureau of Parks and Recreation staff do not have a documented idea of the “typical” visitor to a state park and which amenities are popular with these visitors based on usage. Using this information, the MDWFP marketing team can see which amenities are being utilized or where to more effectively target marketing efforts.

Exhibit 13, page 25, shows the overall Mississippi state park system occupancy, by facility type, for FY 2019. MDWFP’s 263 cabins, which are on average occupied 40.9% of the time, generate an average of \$11,084.05 each. In contrast, MDWFP’s 48 motel rooms, which are booked 23.9% of the time, generate \$6,548.72. Given such, cabins generate, on average of \$4,535.30 per year more than motel rooms.

Exhibit 13: State Park Facility Utilization, FY 2019

Facility Type ¹	State Parks (Open)	Total Number	Number Available	Average Days Occupied	Average Length of Stay ²	Average Occupancy Rate	Average Fees Collected (\$)
Meeting Room	15 (13)	29	26	32.1	1.0	8.8%	5,080.43
Pavilion	18 (16)	57	54	17.8		4.9%	1,103.49
Motel Room	3	48	48	85.6	2.3	23.9%	6,548.72
Cabin	19 (17)	253	239	143.2	2.1	40.9%	11,084.05
Villa	2 (1)	10	2	43.0	2.0	12.1%	14,968.20
Premium Campsite	11	408	407	150.9		42.2%	3,927.18
Standard Campsite	19 (18)	1,198	1,170	86.0	3.9	24.2%	1,602.93
Primitive Campsite ³	16 (15)	225	105	23.2		6.4%	348.22
Beach Campsite	1	70	70	42.6	2.5	11.7%	1,851.47
Group Camp	9	14	14	56.6	0.9	15.7%	1,686.56
Group Primitive Area	4	32	32	20.6	2.0	5.6%	320.77

- (1) Includes facilities that were available to rent and not rented during FY 2019, but excludes any facilities that were not available to rent.
- (2) The data MDWFP provided for LeFleur’s Bluff State Park does not include average length of stay data for pavilions and primitive campsites.
- (3) PEER excluded 24 of the 249 primitive campsites in its reporting due to year-long closure.

SOURCE: Compiled from information submitted by MDWFP.

MDWFP could also use occupancy data to identify currently underutilized business areas. Providing additional support to these areas could supplement future revenue collections by increasing attraction to and utilization of higher-earning amenities. For example, with occupancy rates less than 9% and 5% for meeting rooms and pavilions, respectively, opportunities exist to increase promotion of such facilities to increase park revenues. The 29 meeting rooms, on average, generate more than \$5,000 per booking, while the 57 pavilion rentals generate more than \$1,100 per reservation. Similar opportunities exist for MDWFP's 14 group camp facilities. Currently booked one out of every seven days, the facilities generate more than \$1,600 per booking.

While MDWFP makes customer survey cards and a contact form on the MDWFP website available, the applicability of the feedback received through these cards is limited in guiding park operations. For example, MDWFP has not documented or tracked how eliminated amenities once offered by the parks (e.g., food service) were self-sustaining or not, or how the reduction in such amenities impacted park visitation.

Both park staff and MDWFP central office staff state that amenities offered at state parks were reduced due to declines in funding and a lack of staffing necessary to operate such amenities. This includes, but is not limited to, operation of miniature golf courses, swimming pools, water-related rentals, and food services (i.e., on-site quick service grills or restaurants).

PEER inquired of MDWFP if any post-hoc analysis or cost-benefit analysis had been done to determine why such amenities were eliminated. MDWFP did not document information about the closed amenities' financial stability or popularity. Due to this lack of documentation, there is no effective oversight method to determine if MDWFP simply eliminated the amenities once parks became unable to staff the amenities (and reallocated the resources elsewhere), or if the amenities eliminated were not able to sustain their operation with the revenue the amenity generated for the park.

State Park System Competitors

PEER sought to identify internal and external competition to the Mississippi state park system that could detract from the number of people that visit a state park. This chapter discusses internal and external competition to the state park system.

Internal and External Competition to the State Park System

The state park system faces competition, both internally and externally, that challenges MDWFP's vision to provide affordable outdoor recreational opportunities. Therefore, it is critical for MDWFP to target marketing efforts that will promote visitation to the state park system and maximize potential revenue to support its operations.

According to MDWFP, the state park system exists to provide low-cost, quality outdoor recreational opportunities to Mississippians and visitors to the state. However, the state park system faces internal competition from state fishing lake campgrounds operated by the MDWFP Freshwater Fisheries Bureau. In addition, the state parks system faces external competition from recreational facilities operated by other state and federal governmental entities. For example, some of the state's waterway districts—i.e., the Pat Harrison Waterway District and the Pearl River Valley Water Supply District—operate campgrounds. The U.S. Army Corps of Engineers, U.S. Forest Service, and private campground operators also provide outdoor recreational opportunities throughout the state.

Exhibit 14 on page 29 provides an overlay of the locations for some of the state park system's competition. Currently, there are only three of the 22 active state parks that have no competition within a 30-mile radius from the park. Out of the remaining 19 active state parks, 13 of these have competition within a 15-mile radius.⁹

Therefore, it is critical for MDWFP to target marketing efforts and offer amenities that will promote visitation to the state park system and maximize potential revenue to support its operations.

For a listing of the names and county locations of various state parks and their competition, by category and county as indicated on Exhibit 14, see Appendix D, pages 48 through 51.

The following sections provide more detail regarding the internal and external competition faced by the state parks system.

State Fishing Lakes

MDWFP's Freshwater Fisheries Bureau operates 20 state fishing lakes. Of the 20 state fishing lakes, 17 offer primitive and RV camping. Three of the 17 state fishing lakes offer full hook-ups (electricity, water, and sewer), while fifteen state fishing lakes offer water and electrical hook-ups.

While PEER did not review MDWFP's operations and maintenance of the state fishing lakes, such separate park-like operations provide direct internal competition with the state park system. Although state fishing lake campgrounds are funded through state fishing lake camping program income, these campgrounds compete with the state park system for

⁹ This analysis includes only parks located within Mississippi, and does not include parks that may be located across the border of a neighboring state.

MDWFP promotion while also serving as another source of market competition in attracting campers, fisherman, and outdoor enthusiasts away from the state park system.

For example, Elvis Presley Lake is a state fishing lake located in Lee County, near Tupelo. The MDWFP Freshwater Fisheries Bureau offers 16 RV camping pads with electrical and water hookups, as well as a sewage dump station onsite at the Elvis Presley Lake. However, the Bureau of Parks and Recreation operates Trace and Tombigbee State Parks, which are both also located within Lee County. Further, MDWFP operates Lake Lincoln State Park in Lincoln County within 15 miles of Lake Jeff Davis in neighboring Jefferson Davis County. As such, MDWFP operates a competing campground within 15 miles of three of its state parks.

State Waterway Districts

The state-established waterway districts also provide outdoor recreational opportunities and maintain campsites and parks. The Pat Harrison Waterway District operates eight campgrounds as well as maintains seven boat ramp sites. The Pearl River Water Valley Supply District, centered around the Ross Barnett Reservoir, operates five parks within the district boundaries while localities within the Pearl River Water Valley Supply District operate an additional seven parks within the district boundaries. The Scenic Rivers Development Alliance operates the Bogue Chitto Water Park, previously overseen by the now-dissolved Pearl River Basin Development District. While these waterway district campgrounds are not part of any MDWFP bureau and do not receive state funds, the waterway districts are still state-established government entities that provide competition to the state park system. For example, the Little Black Creek Campground and Old Augusta River Park - both Pat Harrison Waterway District parks - are located about 15 miles from Paul B. Johnson State Park. Flint Creek Water Park, another Pat Harrison Waterway District park, is located 23 miles from Paul B. Johnson State Park.

U.S. Army Corps of Engineers

In Mississippi, the U.S. Army Corps of Engineers-Mobile District operates six campgrounds. The U.S. Army Corps of Engineers-Vicksburg District operates campgrounds and recreational sites at four lakes, as well as the Jesse Brent Lower Mississippi River Museum in Vicksburg. Five of these campgrounds are located within 15 miles of a state park, while four others are located within 30 miles of a state park.

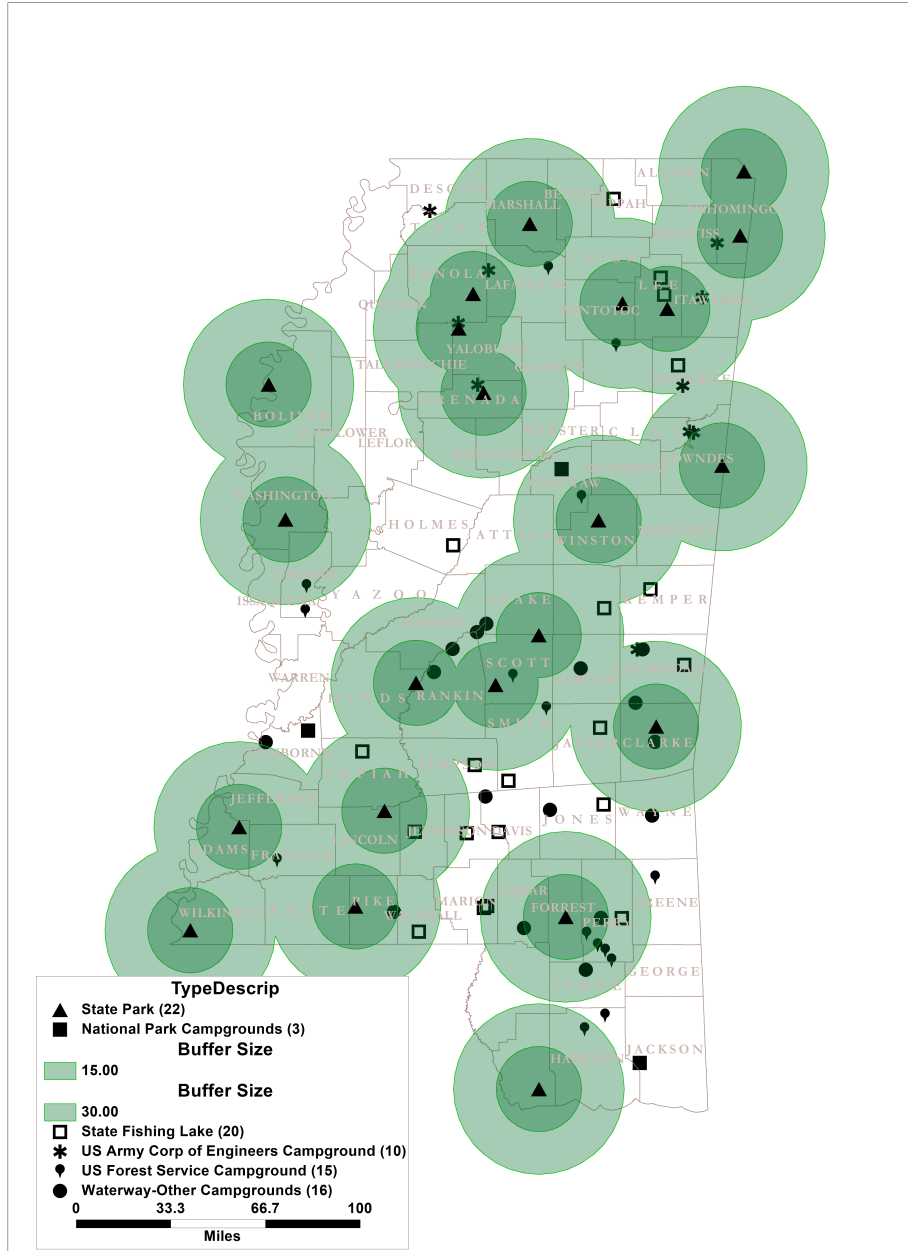
U.S. Forest Service

Additionally, the U.S. Forest Service offers 15 developed facilities throughout the seven national forests in Mississippi. Although these facilities vary in terms of their size and components, each facility offers camping (in some form, be it RV, primitive, or group) as well as day-use access. Day-use components, which vary from site to site may include, picnic areas, playground, swimming beach, trails, fishing access, and/or boat ramps.

Private Campgrounds

Mississippi state parks must also compete with private campground facilities. According to *allstays.com*, there are 120 independent campgrounds operated in Mississippi. These private facilities vary in size and scope, ranging from overnight RV campgrounds targeted at travelers or tourists visiting an area to full-scale, higher end campgrounds that offer amenities such as a water park, swimming pool, miniature golf, etc. Examples of privately-operated camping facilities in Mississippi include Yogi on the Lake (Pelahatchie) and Memphis Jellystone Park Camp-Resort (Horn Lake).

Exhibit 14: Location of State Park System Competition



SOURCE: PEER staff analysis.

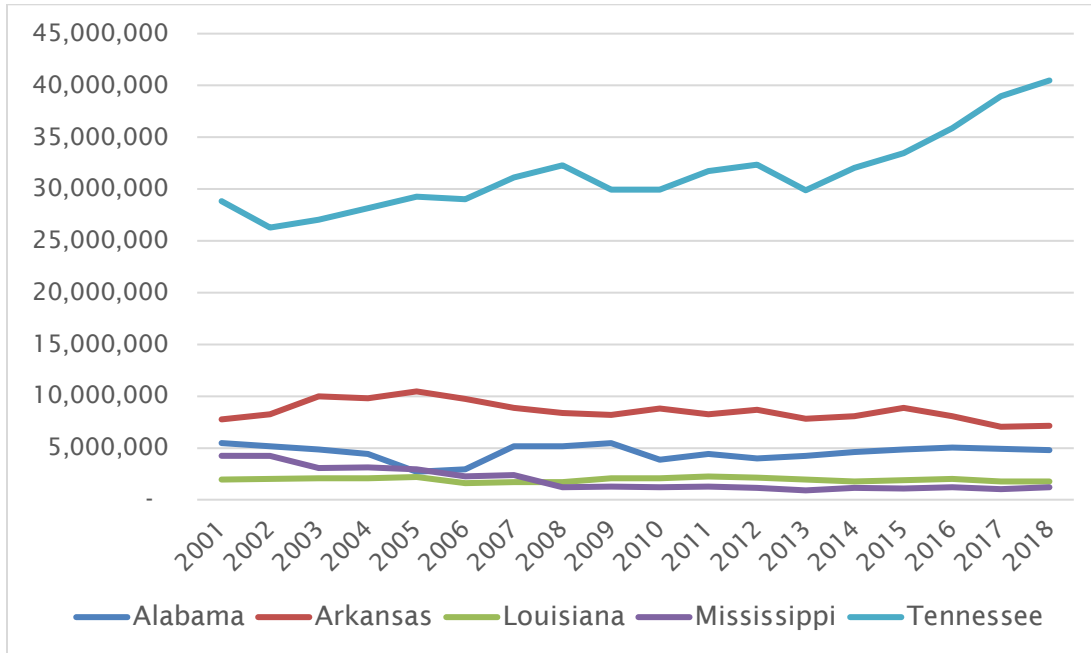
Declining Attendance in Mississippi's State Parks

In comparison with neighboring state parks, Mississippi's estimated annual attendance has declined from over four million in 2000 to just over one million in 2019. However, neighboring state park systems (excluding Tennessee) have not seen any substantial increases in visitation over the last two decades.

As Mississippi's state park system faces various internal and external competitors throughout the state, estimated attendance to Mississippi's state parks has

declined over the past two decades. Between 2000 and 2019, annual estimated attendance decreased from over four million in 2000 to just over one million during 2019.

Exhibit 15: State Park System Estimated Attendance, 2001 to 2018



SOURCE: NASPD AIX 2018-19 Data Report.

Mississippi state park system attendance is the lowest among the neighboring state park systems. Average estimated state park system attendance for 2018 and 2019 indicate that Mississippi’s estimated attendance trends closest to Louisiana, but Louisiana parks still attracted 27% more visitors on average during 2018 and 2019. Mississippi state park attendance is significantly lower than that of its remaining neighboring states.

The outlier is Tennessee, where state park system attendance has increased 33% from 30 million to 40 million visitors per year in the last decade. In addition, Tennessee attendance is more than double that of the other four state park systems combined.

Options that Could be Considered Regarding State Park Operations

Based on the challenges and issues identified regarding state parks, PEER also sought to identify any options that could be taken to potentially improve park operations. Therefore, this chapter addresses the following questions:

- What strategies could MDWFP consider to improve existing park operations?
- What policy options could the Legislature consider for future operation of the park system?

What Strategies could MDWFP Consider to Improve Existing Park Operations?

PEER identified several options that MDWFP could consider to help improve park operations, either through potential increased revenue, additional support for existing state park staff, and other efforts to potentially increase park visitation. MDWFP could enhance and upgrade the state parks app to maximize opportunities to collect revenue. MDWFP could also expand upon and promote additional community buy-in that is already in place at several state parks to supplement park resources and staffing. MDWFP could also consider the option of contracts for additional park amenities similar to what has been done in other states, such as Florida, in order to potentially increase park revenue and park visitation.

Based on information provided by MDWFP and during site visits to state parks, PEER identified several options that MDWFP could consider to help improve park operations and overcome some of the challenges regarding limited resources and limited park staffing. These options MDWFP could consider include: enhancements to the “MS State Parks” app; expanding efforts and promotion of community buy-in; and consideration of the use of contracts for additional park amenities similar to what has been done in other states. These options should each potentially generate increased revenue, provide additional support for existing state park staff, and increase park visitation.

The following sections briefly describe each of these options.

Improving the Capabilities of the “MS State Parks” App

MDWFP offers two mobile applications to customers: the “MS State Parks” app and a hunting and fishing-centric app. Although park visitors can make reservations through the “MS State Parks” app, MDWFP could enhance the capabilities of the app to capture more revenue and capture more customer data to better inform decision-making.

MDWFP offers two mobile applications (apps) to department customers: the “MS State Parks” app, which focuses on reserving campsites and cabins; and a wildlife and fisheries-centric app that publishes rules and regulations, offers the ability to purchase licenses, allows check-in at MDWFP wildlife management areas, reports game taken at wildlife management areas, among other capabilities. The “MS State Parks” app was developed by *Reserve America*, the reservation system used by the state park system, while the wildlife and fisheries-centric app was developed by

NIC Mississippi in consultation with MDWFP and the Mississippi Department of Information Technology Services (ITS).¹⁰

The two apps differ in design quality and capability, but the principal focus of this analysis is the difference in revenue-collecting potential. The hunting and fishing app contains multiple avenues to collect revenue, as the app user can purchase any hunting or fishing license and immediately have that license available to legally hunt or fish in Mississippi.

The wildlife and fishing app provides more interactive tools, purchasing options, and resources to app users. Comparatively, in the “MS State Parks” app, customers can search for and book cabins, RV campsites, and primitive campsites at any Mississippi state park that has availability. Although providing reservation options through the “MS State Parks” app is a positive method to advertise vacancies at state parks camping sites and cabins (and thus, potentially increase visitation), the app fails to take full advantage of revenue-collecting opportunities for general entrance and boat-related fees that are typically paid into the honesty box with cash. Exhibit 16 on page 32 lists the capabilities for both of the MDWFP-operated applications.

Exhibit 16: Capabilities of the Two MDWFP-Operated Apps

MS State Parks App	Wildlife and Fishing App
<ul style="list-style-type: none"> • Reserve cabins; • reserve RV camping spots; • reserve primitive camping sites; • find first available campsite at each park; • view peak and non-peak seasons; • view list of amenities at the state park; • view campsite map; • list fees and cancellation policies; • view directions to each park; • view alerts and important information; • view park contact information; and, • view park rules. 	<ul style="list-style-type: none"> • Purchase hunting and fishing licenses; • view rules and regulations; • view season bag limits; • view interactive and detailed maps of WMAs; • view feeding times; • interact with a "field guide" with links to some services available in other sections, including: <ul style="list-style-type: none"> ○ registering a boat ○ a map of state fishing lakes ○ fishing reel facts ○ fishing rules and regulations; • read a fishing report at all state-owned lakes (including state park lakes); • report a diseased deer; • apply for an alligator hunting tag; • report game taken at a WMA; • view waterfowl reports; • view an interactive harvest map showing animals taken by county; • view an interactive map showing the location of MDWFP agents; • check-in at a WMA; and, • view temperature, wind speed, wind direction, and sunset time.

SOURCE: PEER analysis of the capabilities of each MDWFP-operated app.

¹⁰ National Information Consortium (NIC) Mississippi is a private company and the state’s e-Government contractor. NIC Mississippi develops mobile applications and multiple state agency websites.

For example, a hunter that visits a MDWFP wildlife management area (WMA) is required to check in and out upon entrance and exit from the WMA, and inform MDWFP of any game that was taken. In contrast, if a state park visitor is attempting to access a state park for day-use purposes (e.g., visiting a playground, hiking on a nature trail) but does not have cash, the state park visitor can either not visit the state park, or illegally enter the state park without paying the day-use fee.

As such, “MS State Parks” app’s current limited revenue-collecting capability misses opportunities to collect greater revenue and increase understanding of its customer base. Through improvements to the “MS State Parks” app, MDWFP can increase the quality of the data it collects, use that data for enhanced marketing efforts, and improve the collection of revenue for general entrance to state parks in a way that the current honesty box system does not accomplish.

Community Buy-In as a Successful Model to Support Parks

Fostering relationships with nonprofit park-support groups or local government entities offers a means by which the state park system can supplement both funding and labor, although such relationships do not supplant the need for targeted improvements to staff and maintenance funding.

Paul B. Johnson and Clarkco State Parks offer differing methods by which a local community can support park operations. Paul B. Johnson benefits more directly from the relationship maintained with the Forrest County government. Clarkco demonstrates what direct community involvement, volunteer labor, and fundraising can achieve in supporting park staff.

Paul B. Johnson State Park, located within Forrest County, maintains a good working relationship with the county, allowing the park to supplement staff capabilities in maintenance and staffing for special events. Paul B. Johnson State Park employees described receiving crucial assistance from Forrest County employees on a variety of maintenance tasks, including picking up limbs, paving potholes on the roads throughout the park, and even performing erosion control, all at no cost to the park.

Additionally, Paul B. Johnson typically hosts a Fourth of July fireworks show that drives a large number of visitors to the park (e.g., in 2019, the event generated \$2,420 due to the increased day-use fee of \$10 per car for entrance to the event). Increased staffing is necessary to hold such an event, such as additional security. During this event, the Forrest County sheriff sent fifteen deputies to supplement the event staff and provide security for the event. Therefore, the park can accomplish more through this relationship maintained with the county than it could on its own.

Clarkco State Park experiences community buy-in through a non-profit foundation named the Friends of Clarkco State Park (the Friends Group). This Friends Group is comprised of 70 local community members from both the Quitman and Meridian areas that volunteer their time and financial resources to help make improvements to Clarkco State Park. This additional funding support and volunteer labor allows for improvements to basic facilities and park amenities while also supplementing the park staff.

The Friends Group has assisted the park through a myriad of fundraising efforts (e.g., membership dues, special event fees, and “adoption” of benches placed within the park). Through these efforts, the Friends Group accrues financial resources that it then uses to support maintenance efforts in the park. For

example, the Friends Group recently purchased railroad ties, which are used to provide support to the backs of RV camping pads.

The Friends Group also provides volunteer labor to the park that includes both maintenance projects (e.g., constructing bridges and installing railroad ties) and enhancements to park amenities. For example, eight families within the Friends Group have “adopted” cabins, meaning they add homemade curtains, artwork, and finishing touches that give cabins at Clarkco a personal and unique feel.

While such volunteer efforts likely support other parks throughout the state in some form, PEER’s site visits demonstrated that the community buy-in at these two parks proves crucial to supplementing what the park employees can accomplish alone. However, such community buy-in should not be viewed as a way to supplant the current limitations of park staff and maintenance capabilities.

Consideration of Contracts to Provide Amenities Offered at the State Parks

Contracting with private companies to provide services and amenities to park visitors, as is done in Florida, could enhance the visitor experience.

During the 2011 Regular Session, the Mississippi State Legislature established a pilot program (in House Bill 1181) to lease lands within certain state parks for commercial development, creating the State Parks Pilot Program Advisory Council. MISS. CODE ANN. § 55-3-48 (1972) states that MDWFP:

(2) ...may conduct a pilot program to lease to any person, private entity or governmental entity for commercial development...within the following state parks: George P. Cossar, Hugh White and John W. Kyle.

The statute further states:

(3) (a) Before approving any land or property located within any of the three (3) state parks for commercial lease and development, the commission must make an affirmative finding and enter upon its official minutes a statement that the development of the land will not be incompatible with the outdoor recreational purposes and opportunities existing at the park or inaccessible to the general public.

As such, MDWFP is vested with the authority to explore these same types of commercial offerings to supplement the amenities currently provided in certain state parks.

So far, the primary utilization of contracting out park services or amenities has centered around the operation and management of the golf courses within the state park system. The golf course at Hugh White State Park is leased out to the City of Grenada, and the golf course at John W. Kyle State Park is leased out to a private operator. Other than the golf courses, any other contractual agreements with private vendors throughout the park system involve washing linens for park cabins, providing vending machines, etc., (rather than contractual agreements for amenities geared towards attracting visitors).

Other states have utilized contracts with private vendors to provide additional amenities to park visitors. For example, Florida publishes opportunities for private businesses to contract with the Florida state park system to provide amenities and concession services to park visitors, such as recreational equipment rentals, food and beverage service, merchandise resale, and event management services.

According to the model contract for private service provision at Florida state parks, the private business is responsible for all utilities used at the state park. Such agreements also generate revenue for the Florida state park system, either

through a monthly or annual commission fee. Additionally, the private business is required to obtain liability waivers, if the department finds that such waivers are necessary based on the service provided. Finally, the private business agrees in the contract not to interfere with the daily operations of the park.

By engaging with private businesses to provide additional services at state parks, the Florida state park system is able to provide park visitors with services and activities that would not otherwise be provided. Additionally, the provision of such services can be a revenue driver for the park system, both through the payment of commission to the park system and by driving visitors to state parks to participate in the offerings of these private vendors within state parks.

What Policy Options Could the Legislature Consider for Future Operation of the Park System?

The Mississippi state park system currently faces funding and staffing challenges, and internal strategic challenges. Should the Legislature choose to modify the current governing structure of the state park system by removing it from the governance of MDWFP, the Legislature could choose to create a new agency that encompasses state parks, tourism, and history; move the state park system to the Mississippi Development Authority as a component of the Tourism Division of the agency; or create a standalone park agency.

As previously discussed, the state park system faces challenges resulting from declining staffing and funding, as well as internal difficulties in strategic marketing, utilizing data to guide decision-making, and \$95 million in capital needs. Should the Legislature find these challenges insurmountable for the state park system in its current governance structure, the Legislature could seek to exercise a policy option that modifies or moves the governance of the state park system.

By providing the state park system with an alternative governance structure, the Legislature could exercise a policy option that permits a new approach to operating, promoting, and maximizing potential benefits of Mississippi's state park system as a tourist attraction and outdoor recreational activity.

In order to see what options are currently being implemented in other states, PEER sampled and analyzed 18 geographically-diverse state park systems to determine their respective governance structures and how the state oversees park operations. Exhibit 17, page 36, shows where the state park systems are housed within these 18 states PEER examined.

Exhibit 17: State Agency Types that House State Park Systems

Agency with both Parks and Wildlife/Fisheries Included	Parks Included with Tourism and/or History	Parks Included in an Environmental/Natural Resources Agency	Standalone Parks Agency
Alabama Georgia Iowa Kansas Mississippi Nebraska Texas	Arkansas Louisiana North Carolina Oklahoma South Carolina	Alaska Florida Missouri Tennessee	Arizona Kentucky

SOURCE: PEER analysis of state park websites.

Most of the states PEER sampled oversee its park system operations as a component within an agency with broader authority. Seven of the 18 states, including Mississippi, govern its park system within an agency that also oversees wildlife and/or fisheries. Five other states govern their park systems within an agency that also oversees state tourism and/or historical efforts. Out of the remaining states sampled, four states operate park systems as part of an environmental or natural resources agency, and only two states operate state park systems as a standalone agency.

While Arizona and Kentucky represent the only two states that operate a standalone park agency, both agencies incorporate other functions into their missions. Arizona State Parks and Trails also houses the State Historic Preservation Office, expanding their mission beyond a singular focus on state parks.

Kentucky’s Department of Parks exists as a standalone agency, but due to the structure of Kentucky’s executive branch, it falls under the umbrella of the Tourism, Arts, and Heritage Cabinet. While the Kentucky Department of Parks does exist as a standalone agency, other sister agencies accompany the park agency in a cabinet under the larger structure of the Kentucky state government.

Based on this sample, PEER identified three governance options that the Legislature could consider regarding the oversight and management of the state park system. These include creating a new state agency that encompasses state parks, tourism, and history, reorganizing to house the state park system within the Mississippi Development Authority’s Tourism Division, or establishing a standalone parks agency.

Should the Legislature choose to pursue one of the alternative governance structures described in this chapter, separating the governance of the state park system from MDWFP could potentially provide a benefit to the state park system. This could allow the state park system to exhibit a renewed focus on motivating tourists to visit state parks, improving the maintenance needs of state parks, and viewing the parks within the lens of tourism and visitation, rather than as an outdoor pursuit alongside hunting, fishing, and conservation in the state.

Each of these options are briefly described in the following discussion.

Creation of a Department of History, Parks, and Tourism

By creating a Department of History, Parks, and Tourism, the Legislature would place Mississippi in line with five states from the sample PEER analyzed. Placing the parks, tourism, and history functions of state government under one agency could potentially allow for increased coordination in promoting and managing the state's resources that drive tourism in the state.

Removing the state park system from MDWFP, removing Visit Mississippi from MDA, and joining these two business areas with the Department of Archives and History (MDAH) to create a new department with a broader mission than that of the current MDAH is a policy option that would prevent the creation of an entirely new department (i.e., the need to fill newly created administrative roles) while aligning the state park system's governance structure with an alternative to the current structure used in other states.

Of the 18 state park agencies PEER analyzed, five fit specifically into the category of an agency that contains state parks, tourism, and/or history or heritage. These five states are listed in Exhibit 18 on page 38.

As seen in Exhibit 18, though these five state governments operate a parks plus history/tourism agency, the functions of those agencies vary greatly. Arkansas provides the most similar example to a proposed Department of History, Parks, and Tourism. In Arkansas, the state's agency promotes tourism, while also managing state parks, historical resources, and museums. North Carolina also provides an example of a state with a broad agency mission—the state charges its Department of Natural and Cultural Resources with overseeing history, libraries, the arts, and natural resources such as zoos and land management.

MDAH currently manages various museums and historical sites, while also containing other functions of state government such as archiving state data and government records. Visit Mississippi, as previously discussed, would bring an existing infrastructure of tourism promotion for the state. S. B. 2820 (2021 Regular Session), would have created the Department of Tourism, but the Mississippi House of Representatives ultimately did not approve the bill, indicating that some legislators may prefer to separate the tourism functions of the state government from its current location within MDA, while others may not.

Exhibit 18: States with a Parks, Tourism, and/or History Agency

State	Agency Name	Functions of State Government Included
Arkansas	Department of Parks, Heritage and Tourism	Promotes tourism in the state and state parks, preserves and promotes heritage, and manages museums
Louisiana	Department of Culture, Recreation & Tourism	Focuses on tourism promotion, state parks, and grant opportunities to expand recreational offerings
North Carolina	Department of Natural and Cultural Resources	Includes parks, zoos, land and water management, aquariums, archives and history, libraries, and arts
Oklahoma	Tourism & Recreation Department	Promotes tourism and incorporates parks into the agency website
South Carolina	Department of Parks, Recreation and Tourism	Focuses on improving recreational opportunities through grant funding and promotes tourism

SOURCE: PEER analysis of state park websites.

A 2003 study from the Travel Industry Association of America found that 81% of American trips in 2003 included a visit to a cultural heritage site or event. Further the National Trust for Historic Preservation notes three trends:

1. Experience is now more important than destination;
2. Sites serve as educators for history - particularly both the domestic and international markets; and,
3. Competition requires cultural heritage sites and events to provide high-quality, authentic experiences, and promote these experiences through strategic marketing.¹¹

As such, industry studies suggest that including the tourism function of state government alongside historic preservation can provide a means by which states can attract visitors with authentic tourism experiences at museums, historical sites, and historic-cultural trails (i.e., the Blues Trail and the Freedom Trail).

For example, in interviews with state park employees, those employees described the popularity of the Mississippi Blues Trail with international travelers, stating anecdotally that these travelers will at times stay in state parks, typically at RV camping sites.

With camping currently comprising the largest share of revenue generated in Mississippi's state parks over the past three fiscal years (FY 2018, 42.37%; FY 2019, 42.41%; FY 2020, 50.97%), syncing historic tourism with camping opportunities promoted by Visit Mississippi's marketing professionals provides a policy option

¹¹ National Trust for Historic Preservation, Preservation Leadership Forum. "Authenticity in Cultural Heritage Tourism."

that syncs Mississippi's natural and historical tourist experiences, while taking advantage of existing administrative functions needed when establishing a new agency.

Moving the State Park System within MDA

Another option is to house the state park system alongside a tourism-focused agency similar to the governance structure used by some other states. Therefore, the Legislature could consider placing the state park system under the purview of the Mississippi Development Authority (MDA).

Arkansas, Louisiana, North Carolina, Oklahoma, and South Carolina all house their state park system within a larger agency dedicated to state parks and either history or tourism. Further, Alaska, Florida, Missouri, and Tennessee house their state park system in an agency also dedicated to environmental functions of state government (e.g., land management, environmental protection).

Including the state park system within an agency that is focused on either tourism and/or history, or a state's environmental resources presents alternative functions of state government with which to pair the state park system (as opposed to wildlife and fisheries). Each of the previously referenced states does not include the wildlife and fisheries functions of state governance with the state park system.

The Legislature could choose to move the state park system under the purview of MDA. The state park system would be paired with Visit Mississippi (MDA's Tourism Division), similar to the way in which Arkansas, Louisiana, North Carolina, Oklahoma, and South Carolina include their respective state park systems with state agencies also overseeing tourism or history. This could also allow for the potential utilization of shared services for administrative purposes, similar to how MDWFP currently oversees state parks.

Further, the marketing infrastructure and personnel currently in place at Visit Mississippi could potentially provide a natural partner to the state park system. Currently, Visit Mississippi partners with the state park system to promote state park golf courses; has travel writers visit state parks; and promotes state parks in brochures, on social media, and via the Visit Mississippi website. By working under the same department umbrella, Visit Mississippi could provide a coordinated state park promotional strategy.

Establishing a Standalone Agency for Mississippi's Park System

One option provided to the Legislature is the removal of the state park system from MDWFP and establishment of the system as a standalone agency.

One policy option would be to establish a standalone state park agency. However, such a standalone parks agency would make Mississippi's state park system an outlier among surrounding states.

In establishing a standalone state park agency, the costs associated with establishing a standalone state park agency would include hiring executive leadership, administrative staff to perform budgeting functions, and maintaining an IT staff capable of supporting the state parks' websites, mobile application, and other IT needs of a standalone agency.

Currently, the state park system benefits from its place within MDWFP, due to the fact that the budgeting, marketing, IT, and administrative support functions needed to operate an agency are shared amongst the six MDWFP bureaus.

Considerations Prior to Taking Action on Changes to State Park Governance

S. B. 2486 (2021 Regular Session) as passed in the Senate would have created a study committee to look at various issues surrounding modification to the current state park governance structure. Prior to any major changes to the current structure, it is imperative to consider potential issues that may result.

Should the Legislature choose to modify the governance structure of the state park system, as is contemplated in S. B. 2486 (2021 Regular Session) it would be prudent to fully consider the potential ramifications of such a change, including:

- The feasibility and desirability of repurposing certain state parks (Lake Lincoln State Park, Natchez State Park), and the best alternative for each park should the repurposing not be feasible or desirable;
- The best management strategy for Clark Creek Natural Area;
- The implications of renewal versus nonrenewal of the state's leases with the U.S. Army Corps of Engineers for the John W. Kyle, George P. Cossar, and Hugh White State Parks;
- Whether certain specified local governments would be willing and able to accept conveyance of state parks in their county or municipality for the purpose of maintaining and operating them as county or municipal parks, and the best alternative for each park should the conveyance not be feasible;
- The feasibility and desirability of leasing certain state parks to private companies for the purpose of maintaining and operating them for the recreational benefit of the public; and,
- Grantee requirements pertaining to select United State Land and Water Conservation Fund (LWCF) language.

Further discussion of such issues can be found in Appendix F, page 53.

Recommendations

1. MDWFP should utilize data-driven decision-making to prioritize maintenance projects compiled within the annual *State Parks Capital Needs* document and the park maintenance booklet. For example, MDWFP could utilize reservation data and occupancy reports to efficiently target available resources on identified capital improvement needs, such as expanding RV camping at select parks.
2. The Legislature should consider directing the Department of Finance and Administration Bureau of Building to perform an updated architectural needs study and cost assessment of the state park system.
3. MDWFP should identify areas within the Bureau of Parks and Recreation that are critical staffing needs, and consider efforts to increase the number of state park employees hired as FTE PINs rather than contractual workers. This will allow MDWFP to invest in employees that would potentially be more invested in the success of the state park system and strengthen the institutional knowledge and overall performance of park operations.
4. MDWFP should develop and implement a formal strategic marketing plan to promote the state parks. MDWFP should continue to explore methods to promote the parks, including enhancing its online presence, and track any changes in park attendance attributable to those efforts. Furthermore, MDWFP should consider the following marketing-related efforts:
 - a. Increase the state park system's social media presence, particularly as it applies to promoting individual state parks and their respective amenities and any special activities or events.
 - b. Increase the autonomy of marketing efforts, such as MDWFP-approved templates, to assist park managers and MDWFP central office staff in creating consistent marketing messages, but also allow individual state parks the ability to market special events or other offerings.
 - c. Evaluate and consider park-related promotional packages. For example, MDWFP should evaluate the level of success of its "Hunter's Special" (i.e., promotional lodging rates for hunters to stay at state parks near public hunting lands) and determine the benefit of similar promotional packages for other parks or amenities (e.g., golf packages).
5. Given the potential for non-payment of entry fees as a result of the existing honesty box system at most of the state parks, MDWFP should study the cost of its plan to release a request for proposals (RFP) to replace its current reservation system with staff and mechanical gate arms in comparison to the estimated revenue collected annually from honesty boxes. Specifically, MDWFP should ensure that the cost to implement the RFP would be equivalent to, or less than, average honesty box collection amounts.

6. In order to address declining general fund support and staffing levels, MDWFP should consider options to generate additional revenue and support existing park staff. Such options include, but are not limited to, the following:
 - a. Enhance and upgrade the “MS State Parks” app to match the capabilities of the agency’s hunting-focused app in order to maximize opportunities to collect revenue (e.g., ability to pay entrance fees and purchase annual passes via the mobile app).
 - b. Expand upon or develop public and private partnerships to support the state park system, both at the local and state level. This could be either through an informal partnership with local and/or county governments to provide support to state parks, such as the one that exists at Paul B. Johnson State Park, or, through a more formal partnership such as the collaboration between Clarkco State Park and the non-profit Friends of Clarkco State Park group.
 - c. Consider the option of contracting with private vendors for additional park amenities (e.g., recreational activities, food service), similar to what has been done in other states, such as Florida.
7. The Legislature could exercise a policy option that permits a new approach to operating and promoting Mississippi’s state park system, in order to strive to maximize the potential benefits of the state park system as a tourist attraction and outdoor recreational activity. PEER identified the following four options, should it be the will of the Legislature, to modify the current governing structure of the Mississippi state park system by removing it from the governance of MDWFP:
 - a. retain the current governance structure, but consider legislation that requires MDWFP to address deficiencies, and requires the Executive Director to make periodic reports on the progress of such improvements to each chamber’s Committee on Wildlife, Fisheries and Parks;
 - b. create and establish a new agency that encompasses state parks, tourism, and history, and requires the Executive Director of the new agency to periodically report to each chamber’s Committee on Wildlife, Fisheries and Parks on the progress of aligning the newly combined functions of state government;
 - c. reorganize the state park system to house its oversight within the Mississippi Development Authority’s Tourism Division, and requires periodic reports to each chamber’s Committee on Wildlife, Fisheries and Parks on the progress of integrating state parks into agency operation; or,
 - d. create and establish a standalone park agency that periodically reports its progress to each chamber’s Committee on Wildlife, Fisheries and Parks.

Appendix A: Park-Related Revenue, FY 2018 to FY 2020

Revenue Type	FY 2018 (\$)	FY 2019 (\$)	FY 2020 (\$)	3-Year Average (\$)	Percent
General Entrance Fees	352,676	339,744	256,973	316,464	3.65%
Annual Park Entrance Permits	16,725*	17,250	16,200	16,725	0.19%
Annual Horse/Other Vehicle Permits	1,813*	2,074	1,551	1,813	0.02%
Fishing	61,854	57,461	75,626	64,980	0.75%
Boat Launch/Rentals	96,244	104,119	92,647	97,670	1.13%
Overnight Rentals	3,289,786	3,260,162	2,063,675	2,871,207	33.13%
Camping	4,021,535	4,000,698	3,608,162	3,876,798	44.73%
Group Camping	352,925	360,620	177,551	297,032	3.43%
Marina	127,271	123,954	124,646	125,291	1.45%
Miscellaneous	144,024	148,923	126,364	139,770	1.61%
Recreational Facilities Rental	286,606	279,920	134,792	233,773	2.70%
Water-Related Activities	468,703	485,228	248,586	400,839	4.62%
Leased and Commission	3,535	3,493	998	2,675	0.03%
Sales	267,774	249,150	151,300	222,741	2.57%
Total including sales taxes	\$9,491,471	\$9,432,795	\$7,079,073	\$8,667,780	

*PEER did not receive actual revenue amounts for FY 2018. The figures presented are averages of FY 2019 and FY 2020 revenue amounts for the same categories.

SOURCE: PEER analysis of information submitted by MDWFP.

Appendix B: MDWFP Revenue from Golf Courses, FY 2018 to FY 2020

Golf Course	FY 2018 (\$)	FY 2019 (\$)	FY 2020 (\$)	3-Year Average (\$)
Dogwoods Lease	10	10	10	10
Mallard Pointe Lease ¹	2,292	600	6,000	2,694
Quail Hollow Revenue/Lease	377,074	126,932	646	168,217
LeFleur's Bluff Revenue	130,800	124,818	54,024	103,214
Total Revenue	510,726	252,360	60,680	274,589

¹ MDWFP staff stated that the management group responsible for Mallard Pointe was delinquent in lease payments. However, these payments were provided to MDWFP on October 13, 2020, and therefore will be reflected in FY 2021 revenue collections.

SOURCE: PEER analysis of information submitted by MDWFP.

Appendix C: State Park System Expenditures, by Category, FY 2018 to FY 2020

MDWFP Central Office Overhead Costs

Expenditure Type	FY 2018 (\$)	FY 2019 (\$)	FY 2020 (\$)	3-Year Average (\$)
Salaries	1,388,090	1,329,578	1,362,541	1,360,070
Contractual	389,541	482,279	479,580	450,467
Dept. of Information Technology Service	0	34,258	0	11,419
DFA - MMRS	0	77,018	105,966	60,995
DFA - Worker's Compensation	153,707	127,343	127,795	136,281
DFA - Unemployment Insurance	5,413	5,674	4,979	5,355
DFA - Tort Claims	35,768	43,333	46,187	41,763
MIS - MDWFP Internal	194,653	194,653	194,653	194,653
Commodities	122,987	133,581	134,251	130,273
Lime, Fertilizer, and Chemicals	18,033	9,266	11,325	12,874
Boat Ramp Material	0	19,361	17,972	12,444
Fish Stock	104,954	104,954	104,954	104,954
Total	1,900,618	1,945,438	1,976,372	1,940,809

SOURCE: PEER analysis of information submitted by MDWFP.

Bureau of Parks and Recreation Operating Expenditures for Support Functions¹

Expenditure Type	FY 2018 (\$)	FY 2019 (\$)	FY 2020 (\$)	3-Year Average (\$)
Park Operations	1,076,403	1,088,287	782,743	982,478
Facilities and Grounds	52,822	1,245	887	18,318
Renovations and Repairs	518,980	449,513	508,381	492,291
Special Project Contingency Funds	767,228	0	0	255,743
Capital Outlay	0	0	0	0
Vehicles	0	0	31,033	10,344
Equipment	4,587	11,199	6,343	7,376
Total	2,420,019	1,550,244	1,329,387	1,766,550

¹Support functions (i.e., special project contingency funds) do not include costs associated with administering and dispersing Land and Water Conservation Fund (LWCF) and the Recreational Trail Grant program, since MDWFP assumes the costs of such federal grant administration on behalf of not only the state park system, but also local government entities applying for such federal funds.

SOURCE: PEER analysis of information submitted by MDWFP.

MDWFP Direct Operating Costs Associated with Operating State Parks

Expenditure Type	FY 2018 (\$)	FY 2019 (\$)	FY 2020 (\$)	3-Year Average (\$)	Percent
Salaries	2,812,554	2,771,400	2,605,762	2,729,905	34.0%
Travel	0	70	1,722	597	0.0%
Contractual	4,616,287	4,388,319	4,058,296	4,354,301	54.4%
Commodities	893,230	674,088	663,405	743,575	9.3%
Capital Outlay	0	0	1,750	583	0.0%
Equipment	72,113	18,638	38,522	43,091	0.5%
Vehicles	0	0	0	0	0.0%
Subsidies, Loans, and Grants	197,714	153,884	88,098	146,565	1.8%
Total	8,591,898	8,006,399	7,457,555	8,018,617	100.0%

SOURCE: PEER analysis of information submitted by MDWFP.

State Park Golf Course Operations

Golf Course ¹	FY 2018 (\$)	FY 2019 (\$)	FY 2020 (\$)	3-Year Average (\$)
Quail Hollow ²	490,072	104,777	172	198,340
LeFleur's Bluff	197,070	175,933	111,148	161,384
Total	687,142	280,711	111,320	359,724

¹ Operation of the Dogwoods and Mallard Pointe golf courses are contracted out by MDWFP.

² Operation of Quail Hollow was contracted out by MDWFP as of August 15, 2018.

SOURCE: PEER analysis of information submitted by MDWFP.

Federal Grant Program Expenditures

	FY 2018 (\$)	FY 2019 (\$)	FY 2020 (\$)	3-Year Average (\$)
Cost to Administer Grants (\$)	82,093	72,046	48,348	67,496
Grant Funding Disbursed (\$)	18,873	66,253	445,050	176,725
Total	100,966	138,299	493,398	244,221

SOURCE: PEER analysis of information submitted by MDWFP.

Appendix D: State Park System Competition Locations, by Category, as Shown in Exhibit 14, page 29

State Park System* ▲

Number	State Park	County
1	Buccaneer State Park	Hancock
2	Clark Creek Natural Area	Wilkinson
3	Clarkco State Park	Clarke
4	Golden Memorial State Park	Leake
5	Great River Road State Park	Bolivar
6	George P. Cossar State Park	Yalobusha
7	Hugh White State Park	Grenada
8	J.P. Coleman State Park	Tishomingo
9	John W. Kyle State Park	Panola
10	Lake Lincoln State Park	Lincoln
11	Lake Lowndes State Park	Lowndes
12	LeFleur's Bluff State Park	Hinds
13	Legion State Park	Winston
14	Leroy Percy State Park	Washington
15	Natchez State Park	Adams
16	Paul B. Johnson State Park	Forrest
17	Percy Quin State Park	Pike
18	Roosevelt State Park	Scott
19	Tishomingo State Park	Tishomingo
20	Tombigbee State Park	Lee
21	Trace State Park	Lee
22	Wall Doxey State Park	Marshall

*Does not include Floewood State Park, Shepard State Park, or Holmes County State Park (now a State Fishing Lake).

NOTE: The symbol immediately following each chart title in Appendix D represents the same symbol used to represent that park type in Exhibit 14, page 29.

State Fishing Lakes □

Number	State Fishing Lake	County
1	Lake Bill Waller**	Marion
2	Lake Bogue Homa**	Jones
3	Calling Panther Lake	Copiah
4	Lake Claude Bennett	Jasper
5	Lake Columbia	Marion
6	Elvis Presley Lake	Lee
7	Holmes County State Park Lake	Holmes
8	Lake Jeff Davis	Jefferson Davis
9	Kemper County Lake	Kemper
10	Lake Lamar Bruce	Lee
11	Lake Mary Crawford	Lawrence
12	Lake Mike Conner	Covington
13	Lake Monroe	Monroe
14	Neshoba County Lake	Neshoba
15	Lake Perry	Perry
16	Prentiss Walker Lake	Smith
17	Simpson County Lake	Simpson
18	Tippah County Lake	Tippah
19	Lake Tom Bailey	Lauderdale
20	Lake Walthall**	Walthall

**Does not offer camping.

U.S. Forest Service Campgrounds

Number	U.S. Forest Service Campground	County
1	Marathon Lake	Smith
2	Shockaloe Trail (Base Camp I)	Scott
3	Turkey Fork Recreation Area	Greene
4	Big Biloxi Recreation Area	Harrison
5	Cypress Creek Landing	Forrest
6	Fairley Bridge Landing	Stone
7	Janice Landing	Forrest
8	Moody's Landing	Forrest
9	P.O.W. Camp Recreation Area	Harrison
10	Blue Lake Recreation Area	Sharkey
11	Little Sunflower River Recreation Area	Sharkey
12	Puskus Lake Recreation Area	Lafayette
13	Clear Springs Campground	Franklin
14	Choctaw Lake Campground	Choctaw
15	Davis Lake Campground	Chickasaw

U.S. Army Corp of Engineers Campgrounds *

Number	U.S. Army Corps of Engineers Campground	County
1	Arkabutla Lake	Tate
2	Enid Lake	Yalobusha
3	Grenada Lake	Grenada
4	Sardis Lake	Panola
5	Twitley Campground (Twitley Branch Campgrounds)	Lauderdale
6	Blue Bluff Campground	Monroe
7	Dewayne Hayes Campground	Lowndes
	Jamie L. Whitten	Itawamba
9	Piney Grove	Prentiss
10	Town Creek	Clay

State Waterway District Campgrounds ●

Number	Waterway District Campground	County
1	Little Black Creek Campground and Park	Lamar
2	Archusa Creek Water Park	Clarke
3	Big Creek Water Park	Jones
4	Flint Creek Water Park	Stone
5	Maynor Creek Water Park	Wayne
6	Okatibbee Water Park	Lauderdale
7	Dry Creek Water Park	Covington
8	Dunn's Falls Water Park	Lauderdale
9	Turkey Creek Water Park	Newton
10	Old Augusta River Park	Perry
11	Timberlake Campground	Rankin
12	Goshen Springs	Rankin
13	Coal Bluff	Scott
14	Leake County Water Park	Leake
15	Bogue Chitto Waterpark and Campground	Leake
16	Grand Gulf Military Park***	Claiborne

***Grand Gulf Military Park is a state entity operated by the Grand Gulf Military Monument Commission.

National Park Campgrounds ■

Number	National Park Campground	County
1	Gulf Islands National Seashore-Davis Bayou Campground	Jackson
2	Jeff Busby Campground	Choctaw
3	Rocky Springs Campground	Claiborne

SOURCE: PEER analysis of geographic information system data.

Appendix E: MDWFP Park Operation Revenue, FY 2018 to FY 2020

Revenue Category	FY 2018 Revenue (\$)	FY 2019 Revenue (\$)	FY 2020 Revenue (\$)	3-Year Average (\$)	% of 3-Year Average
Documented Payments	8,295,511	8,274,954	6,242,090	7,598,005	87.73%
Overnight Rentals	3,289,786	3,260,162	2,063,675	2,871,207	33.13%
Camping	4,021,535	4,000,698	3,608,162	3,876,798	44.73%
Group Camping	352,925	360,620	177,551	297,032	3.43%
Miscellaneous	144,024	148,923	126,364	139,770	1.61%
Water-Related Activities	468,703	485,228	248,586	400,839	4.62%
Annual Park Entrance Permits	16,725*	17,250	16,200	16,725	0.19%
Annual Horse/ORV Permits	1,813*	2,074	1,551	1,1813	0.02%
Other Payments¹	1,195,961	1,157,841	836,983	1,063,594	12.27%
Total	9,491,472	9,432,795	7,079,073	8,667,780	100.00%

NOTE: All fund sources include sales tax.

* PEER did not receive actual revenue amounts for FY 2018. The figures presented are averages of FY 2019 and FY 2020 revenue amounts for the same categories.

¹ Includes honesty box collections and the collection of other Bureau fees that are not made through direct payments.

SOURCE: PEER analysis of information submitted by MDWFP.

Appendix F: Issues Related to the Re-Purposing, Leasing, or Divestiture of Mississippi State Parks

Senate Bill 2486 (as passed the Senate), 2021 Regular Session, sought to create a study committee to develop recommendations for the restructuring of state park ownership, including repurposing parks for other public use, divesting park ownership, transferring park ownership to local governing entities, or leasing state parks to private operators. PEER's concern pertains to the lack of statutory safeguards in the provisions on leasing. Further research should be conducted as to what the state's obligations are under any agreements that the state has entered into (e.g., Land and Water Conservation Fund [LWCF] grants) that could impact the transfer, repurposing, or closure of a state park.

Senate Bill 2486 (as passed the Senate), 2021 Regular Session, sought to create a study committee to develop recommendations for the restructuring of ownership and management arrangements pertaining to Mississippi's state parks. PEER examined the following issues discussed in the bill:

- The feasibility and desirability of repurposing certain specified state parks (Lake Lincoln State Park, Natchez State Park), and the best alternative for each park should the repurposing not be feasible or desirable;
- The implications of renewal versus nonrenewal of the state's leases with the U.S. Army Corps of Engineers for the John W. Kyle, George P. Cossar, and Hugh White State Parks;
- Whether certain specified local governments would be willing and able to accept conveyance of state parks for the purpose of maintaining and operating them as county or municipal parks, and the best alternative for each park should the conveyance not be feasible;
- The feasibility and desirability of leasing certain state parks to private companies for the purpose of maintaining and operating them for the recreational benefit of the public; and,
- Grantee requirements pertaining to select United States LWCF language.

Re-Purpose Certain Specified State Parks

PEER sees no significant policy issues regarding the potential repurposing of Lake Lincoln State Park as a state fishing lake, and Natchez State Park as a wildlife management area, particularly if MDWFP operates each in accordance with requirements to meet federal funding guidelines.

S. B. 2486 proposed a study of the feasibility and desirability of Lake Lincoln State Park as a state fishing lake and Natchez State Park as a wildlife management area, and the best alternative for each park should the repurposing not be feasible or desirable.

PEER did not identify any significant policy issues regarding these courses of action. The conveyance of Lake Lincoln to the state required that the area be maintained for recreational purposes. Assuming that the reclassification as a fisheries lake will enable the public to use the lake for recreation, this would not appear to create any potential legal issues. Additionally, by converting Lake Lincoln State Park to a state fishing lake, the state could potentially utilize federal funding for operational costs if MDWFP meets federal requirements.

PEER sees no conditions or covenants regarding the lands conveyed to the state for Natchez State Park.

Implications of Renewing or Not Renewing Corps of Engineers Leases

Mississippi developed three state parks on land leased from the U.S. Corps of Engineers. Upon termination of this lease, the Corps of Engineers might require the state to restore leased park lands to their condition prior to the start of the lease. From a policy perspective, it might be prudent to ascertain the current condition of the facilities and infrastructure developed with state funds and conduct a cost-benefit analysis on the cost of maintaining operations at these parks versus avoiding additional costs through divestiture.

John W. Kyle State Park, George P. Cossar State Park, and Hugh White State Park were established on land leased from the U.S. Army Corps of Engineers (Corps of Engineers). As of January 22, 2021, MDWFP had not conducted a cost-benefit analysis on the cost of maintaining operations at these parks versus avoiding additional costs through divestiture. In this section, PEER discusses some of the legal and policy implications of renewing versus choosing not to renew the state's land leases for these parks.

Legal Issues

Article 4, Section 95 of the Mississippi *Constitution of 1890* only bars donations of state land to private entities. Consequently, the return of possession of park land to the Corps of Engineers, including the state-constructed improvements, would not raise a constitutional donation issue. The terms of agreement between the state and the Corps of Engineers, however, could present an issue with the removal of state-constructed infrastructure from Corps-owned land in the event that the state chooses not to lease park lands from the Corps of Engineers.

According to information obtained from MDWFP, the state agreed to restore leased park lands to their condition prior to the lease upon termination of the lease. If the Corps of Engineers enforces this term, the state would bear the costs of removing cabins, bath houses, and other structures, including roads and sewer systems, built after the state leased the property. John W. Kyle, George P. Cossar, and Hugh White state parks each contain state-funded structures and improvements that might be subject to removal if the Corps of Engineers required it. The golf courses at Hugh White and John W. Kyle state parks might also be subject to removal.

Policy Issues

If the state does not renew its land lease with the Corps of Engineers, it could lose the benefit of cabins and other improvements that have been developed with state funds. To justify this loss on good public policy grounds, it might be prudent to ascertain the current condition of the facilities and the cost of renovation and upkeep that could be avoided through divestiture.

Implications of Conveying State Parks to Local Governments

Should Mississippi wish to convey state park land to a local government, the state should identify the legal and policy implications of doing so before authorizing any changes. The local governing entity receiving the land should be willing and more capable to financially support the state park than the state.

S. B. 2486 proposed a study analyzing six local governments and their willingness and ability to accept conveyance of state parks for the purpose of maintaining and operating them as county or municipal parks. The parks to be considered for conveyance and the governments they would be conveyed to include the following:

- Great River Road State Park: Bolivar County or Town of Rosedale;
- Florewood State Park: LeFlore County or City of Greenwood;
- Tombigbee State Park: Lee County or City of Tupelo;
- Lake Lowndes State Park: Lowndes County;
- Legion State Park: Winston County or City of Louisville; and,
- Paul B. Johnson State Park: Forrest County or City of Hattiesburg.

Additionally, S. B. 2486 sought to determine the best alternative for each park should the conveyance not be feasible.

Legal Issues

State laws over the years contained provisions addressing the conveying of lands to the state for park and recreational purposes. Some deeds provide that lands conveyed to the state must be used for recreational purposes; in others, the title to the land will revert to the grantor if the state abandons the park. Of the six parks identified in S. B. 2846 for potential conveyance to local government entities, five have deeds that place an obligation on the state to use the land as parks.

Because the language pertaining to the conveyance of each deed varies, the state should identify the implications of conveying particular state parks to local governments on an individual basis prior to authorizing any changes.

Policy Issues

Several of the jurisdictions listed as grantees may not have the revenue to support these parks. In one case, Paul B. Johnson State Park, the property to be conveyed falls outside the corporate limits of the grantee, City of Hattiesburg. An argument could be made that the state is imposing on local governments an unfunded mandate to manage properties that the state has not been able to manage efficiently.

Authority to Lease Certain State Park Properties

The state should consider establishing statutory safeguards to provisions on leasing, including oversight access, procurement requirements, and minimum items to be addressed in lease agreements. It should also consider how best to competitively select and evaluate potential lessees, the method for how revenue will be split between the lessee and the state, and the method for how expenses will be split between the lessee and the state.

S. B. 2486 proposed a study to analyze the feasibility and desirability of leasing certain state parks to private companies for the purpose of maintaining and operating them for the recreational benefit of the public. This includes the following potential parks leases:

- A lease for a north Mississippi group to comprise Trace, J.P. Coleman, Tishomingo, and Wall Dodoxey State Parks;
- A lease for a central Mississippi group to comprise Golden Memorial, Roosevelt, and Clarkco State Parks; and,
- A lease for a south Mississippi group to comprise Percy Quinn and Buccaneer State Parks, and also possibly Paul B. Johnson State Park and Clark Creek Natural Area.

Legal Issues

Conveyance of lands: Several parks' deeds declare that the purpose of the conveyance was to provide land for recreation or a park. Assuming that the lessee is an agent of the states and will operate the park for the state, these provisions should not create any issue regarding reversion or other liability to the state's grantors.

Land and Water Conservation Fund grants issues: Persons charged with the leasing of parks that are subject to LWCF grant agreements will need to be particularly aware of whether a particular park was developed with such funds and whether or not any restrictive language needs to be included in an RFP and in a lease to ensure that no violations occur.

Policy Issues

Lease oversight: In the strictest sense, a lease is not a personal service review, so it is not subject to the processes of review under the Public Procurement Board (PPRB). PEER suggests the leasing process be placed under the authority of PPRB or alternatively, that the study committee set out a statutory procedure wherein the study committee develops and disseminates an RFP for interested parties, reviews rank, and selects a successful proposal.

Competitive Selection of lessees: Competitive selection is used throughout state government to ensure that the state receives the benefits of competition in instances wherein it is likely that multiple firms are capable of competently providing goods or services.

Type of lease: If the state pursues leasing state park land, it should decide whether to lease the park to a private operator (as the Pat Harrison Waterway does with its Little Black Creek Campground) or to lease out portions of operations and/or amenities to private operators (similar to what is done in Florida). If the state should lease to private operators, statutory safeguards should be considered to protect interests of the state.

The state should also consider methods of generating revenue from leasing state parks. The state could lease parks on a flat rate lease basis, a combination of a flat rate lease and commission based on percentage of total revenue, or some other method.

- **Flat rate lease:** a lease that charges a single fixed fee that does not vary.
- **Flat rate plus commission-based lease:** a lease that charges a single fixed fee in addition to earning a percentage of commission on generated revenue.

Expenses: The state should consider the short- and long-term expenses it will still endure while leasing its state parks to private operators, especially in terms of ongoing park maintenance and infrastructure improvements.

Lease agreements: When leasing a state park or a portion of a state park's operations to a private operator, the state should consider minimum items to include as part of its leasing agreements. For example, this might include the following:

- Compliance with applicable federal, state, and local legal provisions in which the state park is subject to;
- Requirements for reporting to MDWFP, Department of Revenue, and any other applicable governing body;

- Authority for MDWFP and other governmental entities to conduct on-site inspect inspections, contract oversight functions, and audits;
- Term of the contract (e.g., 1, 3, 5, or 10 years);
- Approval of amenities added;
- Method for how revenue will be split between the lessee and the state;
- Method for how expenses will be split between the lessee and the state;
- A requirement to obtain liability waivers, if the department finds that such waivers are necessary based on the service provided;
- Responsibility for management and upkeep of the asset;
- Approval of any changes to state park property, and correspondingly, ownership rights in relation to private upgrades to state park property; and,
- Requirement for submitting to financial audits at any time.

Items, such as those above, should be clearly defined and answered in the RFP so as to provide vendors (and the state) a clear understanding of what is to be expected as part of the leasing process. The RFP should also specify evaluation and scoring criteria for the competitive selection of a private vendor.

Grantee Requirements Pertaining to Select United States Land and Water Conservation Fund Language

Prior to transferring, repurposing, or closing a state park, it would be prudent for the Legislature to direct MDWFP to contact the Department of Interior to research any time that the state entered into an agreement for LWCF funding. In receiving LWCF funding to establish and/or further develop 24 state parks, Mississippi entered into grant agreements that included requirements for the grantee to maintain the parks for recreation and operate the applicable property and/or outdoor facilities pursuant to the grant agreement.

LWCF is a federal program established by Act of Congress in 1965 to provide funds and grants to federal, state, and local governments for the acquisition of land, water, and easements on land and water, for the benefit of all Americans. PEER notes that between 1960 and 1980, 24 state parks Mississippi obtained federal LWCF grants to further develop or add specific amenities to the state park.¹² Language in the grant agreements requires the grantee to maintain the parks for “*public outdoor recreation uses*”, and “*to operate and maintain*” the applicable property and/or facilities pursuant to the grant agreement.

However, PEER identified four state parks that received LWCF funding that have since been converted to either a day-use park (e.g., Great River Road State Park), a state fishing lake (e.g., Holmes County State Park), or conveyed to local government entities (Florewood State Park and Shepard State Park).

Given such, prior to taking action, it would be prudent for the Legislature to direct MDWFP to contact the United States Department of Interior (or other applicable entities) to commence the process of researching anytime the state entered into agreement for LWCF funding or other agreements which could impact the transfer, repurposing, or closure of a state park.

¹² Legion State Park has not received LWCF funding.

Agency Response



STATE OF MISSISSIPPI
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GOVERNOR

COMMISSION ON WILDLIFE, FISHERIES, AND PARKS

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COMMISSIONER

May 7, 2021

James A. Barber, Executive Director
Joint Committee on Performance Evaluation and Expenditure Review (PEER)
P.O. Box 1204
Jackson, Mississippi 39215-1204

Re: PEER Review of the Mississippi State Park System.

Dear Director Barber:

Please accept this correspondence as the response of the Mississippi Department of Wildlife, Fisheries, and Parks (MDWFP) to the formal report styled, "A Review of the Mississippi State Park System" recently prepared by the staff of the Joint Committee on Performance Evaluation and Expenditure Review (PEER). We appreciate the opportunity to meet with the reviewing staff prior to the finalization of the report. The following are several comments we have for the Committee's consideration:

- Prior to 2005, when Hurricane Katrina hit Mississippi, the agency received adequate funding for state parks as well as the occasional bond issue for capital improvements. Since then, general fund appropriations to the MDWFP have continued to decline, resulting in budget and personnel cuts (through attrition) in the state parks.
- We also agree that the Mississippi State Parks' operating expenditures are seven times less than neighboring states; however, since 2005, the parks have been expected to maintain a static level of performance with level or reduced funding. Our neighboring states have a mechanism for dedicated funding for their parks, which enables them to spend more on operation, maintenance, capital improvements, and the development of more revenue-producing amenities.
- Although the state parks must compete with federal, county/municipal, and private entities, we feel that comparing the Mississippi State Parks to these "competitors" is hardly comparing equal or similarly situated operations. The federal campgrounds (Corps of Engineers) have the full faith and credit of the United States government behind their funding. Likewise, private recreational "resorts" have the ability to invest, develop, and produce amenities and amusements that can generate revenue. The quality of the state parks simply cannot compare to the quality of the product being offered by the competition.
- Due to the seasonal nature of some of the park jobs, and the limited funding available, using contract workers to perform most park maintenance and related tasks is more cost effective than hiring a state service, salaried, full-time employee. Contract workers and the ability to

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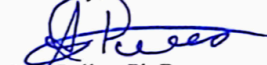
schedule their work within funding and staffing constraints give the MDWFP the flexibility to manage the state parks with reduced funds.

- The report questions our use of certain types of data when prioritizing capital improvements. We do utilize various forms of the recommended data to aid in planning. Every legislative budget request is submitted after much analysis of occupancy reports, user surveys and cost/benefit analyses. These reports are public record and are available from the Legislative Budget Office. The Bureau of Buildings and Grounds of DFA has been most helpful in assisting the MDWFP in securing the best professionals and contractors for the projects we have funding to pursue. Likewise, we use various data such as occupancy rates and user surveys when planning marketing strategies for the parks. In earlier meetings with the reviewing staff, we inadvertently failed to note that all of the referenced data is collected as part of SCORP, the Statewide Comprehensive Outdoor Recreation Plan. SCORP is a requirement of the National Parks Service and is updated every five (5) years. SCORP serves as one of our guides for planning future outdoor recreational projects. A copy is included with this response for your consideration.
- The report suggests that the agency consider increasing the capabilities of the State Parks App to include transactional opportunities. At present, such options are being researched; however, user (transaction) fees may be prohibitive at this time. Additionally, using the app is as much of an “honor-based” practice as putting your fee into an honor box.

In closing, we agree that there are many things within the State Park System that can be done differently, possibly better. However, until the Parks receive funding to replace the aged infrastructure, the customer experience will not change. Over the years, Parks’ sewer, water, and electrical infrastructure has deteriorated, and is in such bad shape, that we no longer have a foundation upon which to maintain or build a self-sustaining, marketable park system. Anything short of replacing the infrastructure, is nothing more than a temporary patch. Year after year, we have requested funding, to no avail. No doubt, the “park experience” would benefit from enhanced marketing, yet when the sewer backs up, or there is no running water, air conditioning, or heat, the “park experience” becomes an embarrassment to the State of Mississippi. This is very disheartening. At one time, our park system showcased Mississippi and was something of which all Mississippians could be proud. The MDWFP has done the best it can with the available resources. Unfortunately, the fact is, the expense associated with replacing an aged, overloaded infrastructure will follow the Parks, no matter where they may be housed.

Thank you for allowing us to review the report and respond to the findings. As stated above, we wish only the best for our state parks, and we appreciate your advice and counsel toward that goal.

Sincerely,



Sam Polles, Ph.D.
Executive Director

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